

Riverside Tool Corp. Response
Attachment 1

Site Survey

**REPORT OF
PHASE I ENVIRONMENTAL SITE ASSESSMENT
ENVIRONMENTAL TEST SYTEMS FACILITY
23575 County Road 106
Elkhart, Indiana**

Prepared For:

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Prepared By:

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September 27, 2004

PROJECT NO: 24134

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Subject: **Report of Phase I Environmental Site Assessment
Environmental Test Systems Facility
Research & Development/Sales Building
23575 County Road 106
Elkhart, Indiana
Project No: 24134**

Dear Mr. Migedt:

Wightman Petrie Environmental Services, Inc. is pleased to submit this Report of Phase I Environmental Site Assessment for the property referred to as the Environmental Test Systems Facility, Research and Development/Sales Building, located at 23575 County Road 106 in Elkhart, Indiana. The purpose of our services was to identify recognized environmental conditions in connection with the property.

This report is intended for the use of RJM Enterprises, LLC, subject to the qualifications and certifications presented herein. Use of this report for purposes beyond those reasonably intended by RJM Enterprises, LLC and Wightman Petrie Environmental, Inc. will be at the sole risk of the user. If other parties wish to rely on this report, please have them contact us so that a mutual understanding and agreement to the terms and conditions for our services can be established prior to their use of this information.

This report presents project information, which includes survey procedures and limitations, along with our findings, conclusions and recommendations. We appreciate your selection of Wightman Petrie Environmental, Inc. for this project and look forward to assisting you on other future projects. If you have any questions, please do not hesitate to contact us.

Sincerely,

WIGHTMAN PETRIE ENVIRONMENTAL SERVICES, INC.

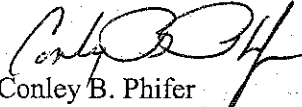

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(Blasland, Bouck & Lee – August 1999)

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(Blasland, Bouck & Lee – August 1999)

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1.0 EXECUTIVE SUMMARY

PROPERTY NAME: Environmental Test Systems Facility
Research and Development/Sales Building
23575 County Road 106
Elkhart, Indiana

This executive summary is provided for convenience and should not substitute for review of a complete report.

On-Site

The subject site, located at 23575 County Road 106, totals approximately 4.4 acres that has been developed with three interconnected concrete slab, steel frame and metal sided buildings, as well as paved parking lots for employees and visitors located along the eastern and northern property boundaries. Access to the facility is via an entrance drive off of County Road 106, located immediately south of the subject site. Historically, we note that the first phase of building construction was initiated in 1985, with the additions of Building #2, and the larger Building #3 occurring in 1989 and 1994, respectively. Prior to construction, the subject site and much of the surrounding area served as agricultural farmland. Overall, a total of approximately 35,545 square-feet of building are under roof.

The facility is currently owned and occupied by Environmental Test Systems, Inc., a wholly-owned subsidiary of Hach Company, Inc., as research and development laboratories, as well as sales center, of color indication test strips for chemical analysis. According to Mr. Miller, of FM Stone Commercial, real estate agent for the property, Environmental Test Systems, Inc. will be selling the subject property to RJM Enterprises, LLC for conversion to a specialty tool fabrication/grinding operation known as Riverside Tool, Inc. Environmental Test Systems will essentially relocate all existing operations (research and development/sales) to Building #1, with Riverside Tool occupying Buildings #2 and #3. At the time of our site reconnaissance, Riverside Tool was in the process of installing the various milling and grinding machinery within Building #3.

Environmental Test Systems, Inc. historically performed manufacturing operations associated with the production of paper test strips. The majority of finished products (60 percent) historically manufactured by Environmental Test Systems at the subject site were associated

with the chemically coated disposable strips for the testing of waters (i.e., chlorine levels, pH, alkalinity, etc.) for the pool and spa industry under the brand name of AquaCheck. Approximately 25 percent of the finished products sold were utilized to test chloride levels in mortar under the brand name QuanTab. The remainder of finished products sold included test strips for the testing of chemical levels in soil, industrial water and automotive fluids. We note that with the purchase of Environmental Test Systems, Inc. by Hach Chemicals in 1998, manufacturing operations at the facility were phased out and subsequently transferred to Hach Chemical's facilities in Ames, Iowa. Currently the facility serves as a research and development operation for new and/or improved test strip applications. Marketing operations for the sale of test strips are also conducted from the facility. Current Environmental Test Systems operations are generally confined to Building #2, with Building #1 presently unoccupied.

The subject property was identified by the regulatory database as a "Conditionally Exempt" RCRA Small Quantity Generator, with no reported violations of record. Conditionally Exempt Small Quantity Generators generate less than 100 kilograms of hazardous waste, or less than 1 kilogram of acutely hazardous waste per month. According to Ms. Jean Davis of Environmental Test Systems, hazardous wastes generated by the facility are limited to wastes from the research and development operations (i.e., laboratories). Historically, the facility also produced wastes associated with manufacturing of the chemical test strips, however all manufacturing operations were suspended and transferred to the Ames, Iowa facilities of Hach Company with its purchase of Environmental Test Systems, Inc. in 1998. Manifests for wastes removed from the facility during 2003 and 2004 are typical of laboratory wastes and consist of combustible liquids, corrosive liquids, flammable liquids, peroxides, alcohols and inorganic solids. All such wastes were characterized prior to off-site disposal by a licensed hazardous waste contractor.

During the reconnaissance of the laboratory facilities, WPE noted the presence of three 5-gallon containers of hazardous wastes staged on a secondary containment pedestal. An additional 5-gallon container was noted to be adjacent to a laboratory bench where work was being performed. According to the Laboratory Director, such waste chemicals are transferred in small quantities to the containers, which when full are transferred to the secondary containment pedestal, for subsequent disposal (typically twice per year). WPE did not identify any indications of spillage associated with the transfer or accumulation of the wastes. WPE also noted an accumulation of no longer used reagents/chemicals within the former Mix Room of

Building #1. The accumulations consisted of numerous 5-gallon, gallon, quart and pint-sized containers. According to Ms. Davis, Environmental Test Systems is awaiting direction from Hach Company with respect to whether such chemicals are to be disposed or shipped to the Ames, Iowa facility for potential use. WPE recommends that the disposition of such chemicals be determined for transfer to the Ames, Iowa facility and/or disposal in accordance with applicable regulatory criteria.

Underground or aboveground storage tanks were not identified during the reconnaissance of the subject property. Historically, a former underground concrete containment tank, installed along the western side of Building #3, was utilized to contain any potential liquid spills from test paper drying unit utilized during manufacturing operations. A catch basin beneath the paper drying unit (Dryer #2) was designed to convey liquid to the tank. According to ETS personnel familiar with manufacturing operations at that time (1999), the catch basin was sealed and the concrete containment tank removed from the ground (tank had no outlet connections and was not used prior to removal).

Electrical transformers, while noted along the eastern and western property boundaries of the subject site, did not indicate any evidence of leakage. Other than periodic mowing of the lawn, no contracted maintenance services are currently performed at the subject site.

The City of Elkhart has provided potable water to the subject site since at least 1992. Prior to that time, potable water was provided by a series of water wells, one of which remains in service as part of the fire protection system for the building (other well closed). The facility is currently connected to the City of Elkhart municipal sanitary sewer system (since 1992). Prior to that time, two on-site septic systems were utilized for treatment of sanitary and process wastewaters. According to the 1999 Blasland, Bouck & Lee Phase I Environmental Site Assessment, liquid from the septic system on the east side of Building #2 was sampled in 1992 and revealed the presence of toluene at 54 parts per billion (ppb), whereas the liquid from the septic system located at the south side of Building #1 revealed the presence of 1,1-dichloroethene (1,940 ppb) and 1,1,1-trichloroethane (2,770 ppb). With connection to the municipal sanitary sewer system in 1992, both of the septic systems were reportedly emptied, crushed and abandoned in place by Environmental Test Systems. A manhole was noted on the east side of Building #1 to allow for

the City of Elkhart to sample effluent wastewater from the facility prior to discharge to the sanitary sewer system.

Based upon a concern of potential environmental impact to soil and groundwater resulting from the historical use of the two septic systems, as evidenced by the presence of volatile organic compounds by the 1992 sampling effort, Blasland, Bouck & Lee's Phase I Environmental Site Assessment recommended additional investigation of the former septic systems. The results of such investigation, involving the 1999 sampling of soils and groundwater from a total of six temporary monitoring wells (Geoprobe) identified the presence of arsenic and lead at concentrations that exceed the **current** RISC Integrated System of Closure Default Values established by the Indiana Department of Environmental Management for groundwater at industrial sites. More specifically, the lead concentration detected in the groundwater sample collected from location TW-3, the southernmost leachfield for the southernmost septic system (located along County Road 106) was 0.202 mg/l, with the RISC Default Closure Value of 0.042 mg/l. Similarly, the concentration of arsenic in groundwater collected from location TW-3 was 0.106 mg/l, with the RISC Default Closure Value of 0.05 mg/l. Concentrations of all other constituents detected in the groundwater and soil samples collected from the area of the two former septic systems did not exceed applicable RISC Default Closure criteria. Given the fact that the septic systems were closed in 1992 (removal of liquids, crushing of system components, backfilling with stone) thereby eliminating any continued source of contamination, the facility and surrounding properties have since been connected to public water and sewer systems (1992) thereby eliminating a potential for uptake via drinking water, and the limited nature of the contamination identified (contamination not widespread across the subject site, groundwater at one location only); WPE does not consider such contamination, as identified by the former Phase II Environmental Site Assessment (Blasland, Bouck & Lee – 1999), as having had a significant impact to the subject property or surrounding properties.

Various natural gas fired furnace systems are present throughout the three building complex (various heating zones). In addition the shipping and warehousing areas are equipped with overhead radiant heating units (natural gas fired). Air conditioning is provided to the various office areas and laboratories, with condenser units present along the exterior walls. Chemicals associated with the operation of heating and cooling systems were not identified during the reconnaissance of the subject site.

Himco, Inc provides solid waste services for ongoing Environmental Test Systems, Inc. operations on an as-needed basis. Solid waste services for initial conversion of Building #3 by Riverside Tool are provided by BFI, Inc. During the site reconnaissance, WPE noted the presence of two 8 cubic yard dumpsters (side by side) at a paved access inlet, located along the eastern property boundary, across from Building #3. A roll-off dumpster (15 cubic yard) was also noted within the ramp access dock to Building #3. The roll-off dumpster was being utilized by Riverside Tool Inc. for collection of materials associated with its conversion of Building #3. Visually, WPE did not identify the presence of hazardous materials in any of the three solid waste containers.

Floor drains were noted within the wet labs and instrumentation lab of Building #2. We note that all floor drains are currently connected to the municipal sanitary sewer system. Visual indications of staining or other evidence of releases, discharges or spills to the floor drains were not identified during the reconnaissance of the laboratory areas. WPE also note the presence of a sump system within the area of the Former Mix Room in Building #3. The sump did not appear to have an outlet and was primarily installed as a collection system for any materials that may have been spilled during mixing operations as part of the former manufacturing processes. WPE did not observe any visual indications of historical releases to the collection sump.

Stormwater ditches are present along County Road 106, as well as the eastern and northern property boundaries of the subject site. Several low-lying areas of the site are present along the western and northern portions of the property that essentially serve as retention areas for stormwater runoff. Groundwater flow in the general area of the subject site is assumed to be to the south/southwest, toward the St. Joseph River, located approximately 1.5-miles to the south/southwest of the subject site.

Wightman Petrie Environmental's reconnaissance of the subject site did not identify any areas of significant staining, stressed vegetation or obnoxious odors on the subject site or within the existing buildings.

Off-Site

The current and historical uses of the area surrounding the subject site comprise a mix of industrial and residential properties. There are several off-site regulatory listed facilities located within the specified ASTM search distances from the subject site. The regulatory search identified one RCRA Large Quantity Generator (Ashland Chemical Inc), located at 23740 Cooper Drive (approximately 1/10-mile northwest of the subject site, upgradient). The facility was identified as having several violations of record, all of which appeared to be administrative in nature (with subsequent compliance). The database also identified a total of four RCRA Small Quantity Generator sites, none of which were noted as having any violations of record. Only one UST site was identified by the database search. The Chupp & Sons Conversions facility, located at 53387 ADA Dr. was noted as having a former UST system as Permanently Out of Service (closure date noted as February 1998). Additional sites were identified through a review of Elkhart County Health Department records. However, based upon topographic considerations relative to the subject site, interpreted groundwater flow direction (south/southwest), no noted violations and/or current compliance, and extent of remedial action completed, none of the aforementioned listed facilities would be expected to present a recognized environmental condition to the subject site.

Conclusions

Based on the information made available to Wightman Petrie Environmental, Inc. or obtained during our assessment of the subject property, there are no indications that current or past uses of the subject site and its surrounding properties have resulted in significant environmental impairment of the subject site. We note that two previously existing septic systems utilized at the subject site were closed in 1992 (removal of liquids, crushing of system components, backfilling with stone). It is WPE's assessment that such actions eliminated any continued source of any ongoing contamination. Based upon this, and the fact that the facility and surrounding properties have since been connected to public water and sewer systems (1992), thereby eliminating a potential for uptake via drinking water, and the limited nature of the contamination identified (contamination not widespread across the subject site, groundwater at one location only); WPE does not consider such contamination, as identified by the former Phase II Environmental Site Assessment (Blasland, Bouck & Lee – 1999) as having resulted in a significant impact to the subject property or surrounding properties. As such, no further assessment of the subject site is deemed warranted at this time.

WPE does recommend that the final disposition of chemicals that are no longer being used at the facility (currently stored in Former Building #1 Mix Room0 be determined, with appropriate forwarding to the Ames, Iowa facility and/or appropriate disposal undertaken. We would also recommend that chemicals stored within the laboratory be evaluated as part of the eventual transfer to Building #1, and that any chemicals determined to be outdated or no longer utilized be disposed of in accordance with applicable disposal requirements via a licensed hazardous waste contractor.

2.0 INTRODUCTION

Wightman Petrie Environmental, Inc. was retained to perform a Phase I Environmental Site Assessment (ESA) for the property located at 23575 County Road 106, within the Northwood Industrial Park of Elkhart, Indiana. Such services were requested as part of the pre-purchase environmental due diligence process regarding a proposed real estate transaction involving the subject property. The purpose of our services was to identify recognized environmental conditions in connection with the property, based on readily available information and site observations.

The subject site, consisting of approximately 4.4 acres has been developed with an approximate 35,545 square-foot complex (three interconnected buildings) and associated parking/paved areas. The facility is currently owned and occupied by Environmental Test Systems, Inc., a wholly-owned subsidiary of Hach Company, Inc., as a research and development laboratory, as well as sales center, of color indication test strips for chemical analysis.

2.1 BACKGROUND

Our request to perform the Phase I Environmental Site Assessment of the subject site was received through Mr. Ross Miller of FM Stone Commercial Realty, real estate agent for the property and Mr. Ron Migedt of RJM Enterprises, LLC, the potential purchaser of the subject site. Our services were performed in accordance with our Proposal for Phase I Environmental Site Assessment, dated September 1, 2004, as verbally authorized by Mr. Ross Miller, for Mr. Ron Migedt and RJM Enterprises, LLC, on September 3, 2004. According to Mr. Miller, Environmental Test Systems, Inc. will be selling the subject property to RJM Enterprises, LLC for conversion to a specialty tool fabrication/grinding operation known as Riverside Tool, Inc. Environmental Test Systems will essentially relocate all existing operations (research and development/sales) to Building #1, with Riverside Tool occupying Buildings #2 and #3. At the time of our site reconnaissance, Riverside Tool was in the process of installing the various milling and grinding machinery within Building #3.

2.2 PROCEDURES

The Phase I Environmental Site Assessment was performed using the American Society for Testing and Materials (ASTM) document ASTM E 1527-00.

The following services were provided for the assessment:

- A qualitative hydrogeologic evaluation of the site and vicinity using both published topographic and geologic maps and area observations to characterize the area drainage.
- A review of available documents, maps, aerial photographs and interviews with knowledgeable persons regarding prior investigations, current and historical property uses.
- A review of available environmental reports published by state and federal agencies to determine if the site or nearby properties are listed as having a present or past environmental problem, are under investigation or are regulated by state or federal environmental regulatory agencies.
- A site and adjacent property reconnaissance for obvious indications of present or past activities that have or could have contaminated the site.
- Preparation of this report presenting our findings and conclusions.

2.3 QUALIFICATIONS

The findings and opinions presented are relative to the dates of our site work and should not be relied on to represent conditions at substantially later dates.

The opinions included herein are based on information obtained during the study and our experience. If additional information becomes available which might impact our environmental conclusions, we request the opportunity to review the information, reassess the potential concerns, and modify our opinions, if warranted. If this assessment included a review of documents prepared by others it must be recognized that Wightman Petrie Environmental has no responsibility for the accuracy of information contained therein.

Although this assessment has attempted to identify the potential for "recognized environmental conditions" to the subject property, potential sources of contamination may have escaped detection due to: (1) the limited scope of this assessment, (2) the inaccuracy of public records, (3) the presence of undetected or unreported environmental incidents, (4) inaccessible areas, and/or (5) deliberate concealment of detrimental information.

The client should realize that this report is not a comprehensive site characterization and should not be construed as such. The findings and conclusions presented in this report are predicated on

the results of the site reconnaissance, a review of specified regulatory records, prior environmental assessment reports, and a review of historical usage of the subject property and surrounding properties. The absence of significant indicators that suggest that hazardous materials and/or wastes have impacted the subject property does not preclude the presence of hazardous materials and/or wastes at the property.

Therefore, the report should only be deemed conclusive with respect to the information obtained. No guarantee or warranty of the results of this assessment is expressed or implied within the context of the report or any subsequent reports, correspondence, or consultation. The client should also recognize that the services performed were conducted in general accordance with ASTM Standard E 1527-00 and local standards of care in the geographic region at the time the services were rendered.

ASTM E 1527-00 defines a "recognized environmental condition" as: "the presence or likely presence of any hazardous substances or petroleum products on a property under conditions that indicate an existing release, a past release, or a material threat of a release of any hazardous substances or petroleum products into structures on the property or into the ground, groundwater, or surface water of the property. The term includes hazardous substances or petroleum products even under conditions in compliance with laws. The term is not intended to include de minimis conditions that generally do not present a material risk of harm to public health or the environment and that would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies."

3.0 SITE SETTING

Understanding of a site's physical setting is important to the recognition of environmental impacts to the property.

3.1 GENERAL DESCRIPTION

The subject site, totaling approximately 4.4 acres, has been developed with three interconnected concrete slab, steel frame and metal sided buildings, as well as paved parking lots for employees and visitors located along the eastern and northern property boundaries. Access to the facility is via an entrance drive off of County Road 106, located immediately south of the subject site. Historically, we note that the first phase of building construction was initiated in 1985, with the additions of Building #2 and the larger Building #3 occurring in 1989 and 1994, respectively. Overall, a total of approximately 35,545 square-feet of building are under roof. Prior to construction, the subject site and much of the surrounding area served as agricultural farmland. Currently, surrounding property is characterized as industrial to the north, east and west of the subject property, and residential (subdivision) to the south, across County Road 106.

3.2 HYDROGEOLOGY

A consideration of surface and subsurface drainage and geology are of interest since they provide an indication of the direction that contaminants, if present on-site or off-site, could be transported. The term "upgradient" refers to a location hydraulically upstream.

Wightman Petrie Environmental, Inc. reviewed the following information in regard to the geology and hydrogeology of the site and surrounding area:

- USGS Topographic Map "Elkhart, Indiana", Quadrangle, dated 1961, photorevised in 1981;
- Water Resource Availability in the St. Joseph River Basin, Indiana, dated 1987, published by the State of Indiana, Department of Natural Resources, Division of Water;
- Soil Survey of Elkhart County, Indiana, dated 1974, published by the U.S. Department of Agriculture - Soil Conservation Service.

3.2.1 Geologic Setting

The subject site is located within the St. Joseph River Basin that consists mainly of Paleozoic limestone, dolomite, sandstone, siltstone and shale, which represent deposits of ancient inland seas. Beneath these rocks are Precambrian igneous basement rocks composed mainly of granite, basalt and arkose. All of these rocks are deformed regionally to form the Kankakee and Cincinnati Arches, which together are a bedrock structural high that extends from northwestern through southeastern Indiana. Along the northern side of the high, including the St. Joseph Basin, the sedimentary formations dip about 30 feet per mile to the northeast into the major structural feature called the Michigan Basin. The rocks at the bedrock surface become progressively younger toward the northeast. Bedrock in the area is covered by a thick mantle of glacial drift and does not appear at the modern land surface anywhere in the drainage basin.

According to the Soil Survey of Elkhart County, the general area surrounding the site is of the Plainfield-Chelsea-Tyner association, which is characterized by deep, excessively drained and somewhat excessively drained, coarse-textured soils that are developed in sandy outwash. More specifically, the soils of the subject site are classified as Plainfield fine sand, 0 to 2 percent slope. Plainfield series soils are characterized as nearly level soil on broad, sandy outwash plains. Such soils are formed under mixed hardwoods, have very low available moisture capacity and low organic-matter content. Permeability is considered rapid, with slow runoff. Droughtiness is a limitation and erosion is a hazard in the moderately sloping areas.

3.2.2 Surface Drainage

According to the topographic map of the Elkhart, Indiana Quadrangle, the subject site is located at an elevation of approximately 770 feet above the National Geodetic Vertical Datum (NGVD) of 1929. A stormwater ditch is located at the southern property boundary of the subject site, along County Road 106. A drainage swale is also present at the northern property boundary that conveys surface water runoff eastward and then southerly along a portion of the eastern property boundary toward a common drainage ditch shared by adjacent properties. A review of the original Site Plan for Building #1 (1985) highlights the presence of three retention areas on the subject site. These areas are present along the southern and western property boundary (Retention Area #1), at the southeastern corner of the subject site (Retention Area #2) and along the eastern property boundary (Retention Area #3). The total volume of retention was identified

as being 13,650 cubic feet. WPE notes that Retention Area #3 has been eliminated through the subsequent construction of Building #2 and associated parking areas. However, based upon visual observations at the time of the reconnaissance, it would appear as though low-lying areas consistent with the identified Retention Areas #1 and #2 remain. WPE also noted a low-lying area to the north of the existing parking area (north of Building #3) that allows for subsequent runoff to the aforementioned drainage swale present at the northern property boundary of the subject site. Across County Road 106, elevations continue to be relatively flat.

According to the United States Geologic Survey (USGS) Topographic Map of the Elkhart Quadrangle (see Figure 1 in Appendix A), the subject site's upgradient watershed extends to the north/northeast to topographic highs associated with the existing Indiana Toll Road, approximately 3/4-mile north of the subject site.

3.2.3 Groundwater

Groundwater resources in the St. Joseph River basin are probably the most abundant in Indiana. Significant groundwater supplies are confined to unconsolidated glacial sand and gravel deposits. Wells yielding 200 to 500 gallons per minute are common throughout the basin. Yields of 500 to 1500 gallons per minute are common in areas where sand and gravel deposits are thick. Underlying bedrock, which consists primarily of shale, is not considered an important groundwater source. Recharge to the water table occurs primarily through precipitation infiltrating the upper soils and percolating downward, under the influence of gravity, to the groundwater table. Typically, the water table is not a level surface, but a subdued reflection of the land surface. Depth to the water table is variable, being dependent on many factors that include: the amount of rainfall, the permeability of the soil and the amount of groundwater being pumped in the area.

Groundwater generally flows in directions subparallel to the natural ground surface slopes and under the influence of gravity toward points of discharge such as rivers, creeks, swamps, drainage swales or pumped groundwater wells. Based on surface, we interpret the natural groundwater flow across the site to be toward the south/southwest toward the St. Joseph River, located approximately 1.5- miles to the south/southwest of the subject site.

4.0 REGULATORY INFORMATION

Wightman Petrie Environmental researched the records available at the Elkhart County Health Department, Division of Environmental Health regarding any environmental incidents at the subject site or in the immediate surrounding area. A review of Elkhart County Health Department (ECHD) files did not indicate documented releases associated with the subject site. A review of the files relative to inspections performed in accordance with the Elkhart County Groundwater Ordinance indicated no violations of environmental consequence for the subject site.

A total of two release incidents were reported for the immediate area of the subject site. ECHD records indicated a fuel spill involving approximately 50 gallons of diesel fuel at the ASA Corporation facility at 23319 Cooper Drive in February of 1994 (northeast of subject site, upgradient). The spill was eventually remediated through the excavation and disposal of contaminated soils by April of 1994 (approximately 15 cubic yards of contaminated soil removed). ECHD also records indicated a release of an unknown quantity of hydraulic oil near the easternmost loading dock of the American Electric Components facility, located at 53057 Marina Drive, northeast (upgradient) of the subject site. The spill reportedly involved the historical discharge of hydraulic oils to an existing French drain (spill reported on June 17, 1999). Remedial action in response to the release, completed in August of 1999, involved the excavation and disposal of contaminated soils. Confirmatory samples revealed that levels of contaminants were remediated to applicable regulatory limits.

Based upon the limited nature of the aforementioned releases (soil contamination only), their location relative to the subject site and the fact that both of the releases were remediated to applicable regulatory limits, Wightman Petrie Environmental does not consider these sites to pose a recognized environmental condition relative to the subject site.

Wightman Petrie Environmental, Inc. reviewed regulatory search information prepared by Environmental Data Resources, Inc. (EDR) as contained in Appendix C. This regulatory records search is based on information published by State and Federal regulatory agencies and is used to evaluate if the site or nearby properties are listed as having a past or present record of actual or potential environmental impact. Please note that regulatory listings include only those sites that

are known to the regulatory agencies at the time of publication to be: (1) contaminated, (2) in the process of evaluation for potential contamination, or (3) regulated.

EPA NATIONAL PRIORITIES LIST (NPL)

The Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) established the National Priorities List (NPL) of federal "superfund" sites. NPL sites are targeted for long-term remedial action in accordance with the provisions established by CERCLA. Nationally, over 1,200 hazardous waste sites that require some level of remedial action are listed on the NPL. The following information was found on the EPA National Priority List, dated April 2004:

- The site does not appear on the NPL.
- There are no facilities listed on the NPL within a one-mile radius of the site.

EPA COMPREHENSIVE ENVIRONMENTAL RESPONSE, COMPENSATION AND LIABILITY INFORMATION SYSTEM (CERCLIS) LIST

The Comprehensive Environmental Response, Compensation and Liability Information System (CERCLIS) List is a comprehensive listing of sites where following an initial investigation, either no contamination was found, contamination was quickly removed without need for the site to be placed on the NPL, or contamination was not serious enough to require federal Superfund action or NPL consideration. On the EPA's CERCLIS List, dated May 2004, the following information was found:

- The site does not appear on the CERCLIS List.
- There are no facilities listed on the CERCLIS List within a one-half mile radius of the site.

EPA CERCLIS - NO FURTHER REMEDIAL ACTION PLANNED (NFRAP) LIST

NFRAP is the EPA database of former CERCLIS sites where "no further remedial action is planned" under CERCLA. On the EPA's CERCLIS/NFRAP List, dated May 2004, the following information was found:

- The site does not appear on the NFRAP list
- There are no facilities listed on the NFRAP List within a one-half mile radius of the site.

EPA CORRECTIVE ACTION (CORRACTS) LIST

The CORRACTS List identifies facilities that have conducted, or are currently conducting a corrective action pursuant to a Corrective Action Order based upon a release of hazardous wastes into the environment from a RCRA facility. The following information was identified from the CORRACTS List, dated June 2004:

- The subject site does not appear on the CORRACTS List.
- There are no facilities identified on the CORRACTS List within one-mile of the subject property.

EPA RESOURCE CONSERVATION & RECOVERY INFORMATION SYSTEM (RCRIS) LIST

RCRIS is the EPA database of facilities that generate, transport, store, or dispose of hazardous wastes under the Resource Conservation and Recovery Act. The following information was identified from the various RCRIS Lists, dated June 2004:

The RCRIS-TSD List identifies treatment, storage, and disposal facilities that are permitted under RCRA.

- The subject property does not appear on the RCRIS-TSD List.
- There are no facilities identified on the RCRIS-TSD List within one-half mile of the subject property.

RCRA Large Quantity Generators are facilities that generate at least 1,000 kilograms/month of non-acute hazardous waste (or 1 kilogram/month of acute hazardous waste).

- The subject property does not appear on the RCRA Large Quantity Generator List.
- There is one facility listed on the RCRA Large Quantity Generator List within one-quarter mile of the subject property.

The Ashland Chemical facility, located at 23740 Cooper Drive (approx. 1/10-mile northwest of subject site, upgradient) was identified as a generator of approximately 21,250 lbs of D001 listed wastes (ignitable hazardous wastes having a flashpoint of less than 140 degrees Fahrenheit). The facility was also identified as having six reported violations of RCRA on record. All of the identified violations were reported as of November 11, 1995, with subsequent compliance as of January 1996. The nature of the violations were primarily administrative in nature and focused on a lack of recordkeeping, TSD Preparedness/Prevention requirements, labeling, etc. Enforcement actions associated with the violations were considered written and informal. Indications of conditions associated with "observed releases" were not identified by the database.

Based upon the nature of the violations, and in the absence of "observed releases", WPE does not consider the facility to pose a significant environmental condition with respect to the subject site.

Small Quantity Generators are facilities that generate less than 1,000 kilograms/month of non-acute hazardous wastes.

- The subject property was identified by the regulatory database as a "Conditionally Exempt" RCRA Small Quantity Generator, with no reported violations of record.

Conditionally Exempt Small Quantity Generators generate less than 100 kilograms of hazardous waste, or less than 1 kilogram of acutely hazardous waste per month. According to Ms. Jean Davis of Environmental Test Systems, hazardous wastes currently generated by the facility are limited to wastes from the research and development operations (i.e., laboratories). Historically, the facility also produced wastes associated with manufacturing of the chemical test strips, however all manufacturing operations were suspended and transferred to the Ames, Iowa facilities of Hach Company with its purchase of Environmental Test Systems, Inc. in 1998. WPE was provided copies of "Manifests" for shipment and disposal of hazardous wastes recently generated by the laboratories at the facility, as follows:

Date	Firm/ Facility	Waste Characterization	Quantity
1/23/03	Safety-Kleen Systems Dalton, Illinois	Waste Combustible Liquid, NOS (petroleum naphtha)	5 gal.
8/20/03	Heritage Services Von Roll America East Liverpool, Ohio	Waste Corrosive Liquid, Flammable, NOS (acetic anhydride, hydrochloric acid)	200 lbs
		Waste Corrosive Liquid, Flammable, NOS (1,4-diamino butane, sodium hydroxide)	80 lbs
		Waste Flammable Liquid, Corrosive, NOS (butyl acetone, acetonitrile)	200 lbs
		Waste Oxidizing Liquid, Corrosive, NOS (hydrogen peroxide, potassium permanganate)	8 lbs
		Waste Zinc Dust	8 lbs
		Waste Organic Peroxide, Type F, Liquid (cumene hydrogen peroxide)	7 lbs
		Waste Toxic Liquids, Flammable, Organic, NOS (dichloromethane, 3- dimethylamine phenol)	200 lbs
		Waste Flammable Liquids, NOS (ethyl acetate, tetrahydrofuran)	200 lbs
		Waste Toxic Solids, Inorganic, NOS (sodium azide calgamite)	15 lbs
		Waste Aerosol Flammable, NOS (petroleum distillates, isopropanol)	18 lbs
3/22/04	Heritage Services Indianapolis, IN	Waste Alcohols, NOS (ethanol, isopropyl alcohol)	110 gal.

During the reconnaissance of the laboratory facilities at the subject site, WPE noted the presence of three 5-gallon containers of hazardous wastes staged on a secondary containment pedestal. An additional 5-gallon container was noted to be adjacent to a laboratory bench where work was being performed. According to the Laboratory Director, such waste chemicals are transferred in small quantities to the containers, which when full are transferred to the secondary containment pedestal, for subsequent disposal (typically twice per year). WPE did not identify any indications of spillage associated with the transfer or accumulation of the wastes. WPE also noted an accumulation of no longer used reagents/chemicals within the former Mix Room of Building #1. The accumulations consisted of numerous 5-gallon and gallon, quart and pint-sized containers. According to Ms. Davis, Environmental Test Systems is awaiting direction from Hach Company with respect to whether such chemicals are to be disposed or shipped to the Ames, Iowa facility for potential use. WPE recommends that the disposition of such chemicals be determined and/or disposed of in accordance with applicable guidelines.

- There are four facilities identified on the RCRA Small Quantity Generator List within a one-quarter mile radius of the subject property, as detailed below.

NAME	ADDRESS	APPROX. LOCATION FROM SUBJECT PROPERTY	REGULATORY NOTATION
Voyager Dakat, Inc.	53468 Ada Dr.	Adjacent (west) of subject site	Conditionally exempt status, No Violations
SMM Corp. (Keyline Sales)	53364 Marina	Approximately 1/8 mile northeast of subject site (upgradient)	No Violations
Sherry Designs	53387 Ada Dr.	Approximately 1/8-mile northwest of subject site	No violations
Kellmark Corp.	53465 Ada Dr.	Approximately 1/8-mile west of subject site, (sidegradient)	Conditionally exempt status, No Violations

Based upon the limited quantities of hazardous materials being utilized by the aforementioned RCRA Small Quantity Generators, no violations of record and/or topographic considerations; Wightman Petrie Environmental, Inc. does not consider these facilities to pose a significant environmental condition relative to the subject site.

EPA EMERGENCY RESPONSE NOTIFICATION (ERNS) SYSTEM LIST

The ERNS list is a list of hazardous material spills reported to various State agencies. On the ERNS List, dated December 2003, the following information was found:

- The site does not appear on the ERNS list.
- There are no facilities identified on the ERNS List within one-eighth mile of the subject site.

INDIANA-HAZARDOUS WASTE RESPONSE SITES LIST

Lists of hazardous waste sites that have been assigned a high priority by the Indiana Department of Environmental Management are identified on the Hazardous Waste Response Sites List. A review of the Hazardous Waste Response List, dated March 2004, indicated the following:

- The subject site does not appear on the Hazardous Waste Response Sites List.
- There are no facilities identified on the Hazardous Waste Response Sites List within one mile of the subject site.

INDIANA VOLUNTARY REMEDIATION PROGRAM LIST

The Indiana Department of Environmental Management, Voluntary Remediation Program (VRP) was established in 1993. The VRP provides a mechanism for site owners, operators or potential purchasers to voluntarily enter into an agreement to cleanup contaminated property. When the cleanup is successfully completed, IDEM will issue a Certificate of Completion and the Governor's Office will issue a Covenant Not To Sue for the cleaned up property. A review of the IDEM Voluntary Remediation Program List, dated March 2004, indicated the following:

- The subject site does not appear on the Voluntary Remediation Program List.
- There are no facilities identified on the Voluntary Remediation Program List within one-half mile of the subject site.

INDIANA LANDFILL LISTS

Lists of special waste disposal sites and inactive or permitted solid waste landfills are maintained by the Indiana Department of Environmental Management. A review of the various IDEM lists regarding landfill sites, dated June 2004, indicated the following:

- The subject site does not appear on lists identifying special waste disposal sites, active or inactive solid waste sites.
- There are no facilities identified as a special waste disposal site, active or inactive solid waste site within one-half mile of the subject site.

LEAKING UNDERGROUND STORAGE TANK (LUST) LIST

The Leaking Underground Storage Tank (LUST) List identifies facilities within the State of Indiana that have reported releases of UST contents. The LUST list is maintained by the Indiana

Department of Environmental Management, UST Section. A review of the LUST List, dated June 2004, indicated the following:

- The subject site does not appear on the LUST List.
- There are no facilities listed on the LUST List within one-half mile of the subject site.

REGISTERED UNDERGROUND STORAGE TANK (UST) LIST

The Registered Underground Storage Tank (UST) List is a listing of underground storage tank systems that are registered with the Indiana Department of Environmental Management, UST Section. A review of the UST List, dated June 2004, indicated the following:

- The site does not appear on the Registered Underground Storage Tank list.
- There was one facility listed on the Registered Storage Tank list within one-quarter mile of the subject site. The Chupp & Sons Conversions facility, located at 53387 Ada Drive, northwest of the subject site (sidegradient) was identified as having one underground storage tank system being Permanently Out of Service. According to the database, UST system was "closed" as of February 1998, and there were no reported releases associated with its operation/removal. Based upon the aforementioned, WPE does not consider the former presence and use of the UST system to pose a recognized environmental condition with respect to the subject site.

INDIANA SPILLS LIST

The Indiana Spills List is an accumulation of sites for which spills of petroleum and/or hazardous materials have been reported to the Indiana Department of Environmental Management. A review of the Spills List, dated June 2004, indicated the following:

- The site does not appear on the Spills List.

OTHER LISTED FACILITIES

The subject site was also identified by the regulatory database search as a Facility Index (FINDS) listing. We note that the FINDS List is a cross-referencing database that identifies facilities that are regulated under different and more specific database searches. Information associated with the FINDS listing for the Environmental Test Systems facility indicates regulation under the air quality statutes with respect to reporting under the Toxic Release Information System as well as other air related databases. Such listings are associated with research and development activities (i.e., fume hoods), as well as historical manufacturing operations (exhaust stacks, chemical storage) for test strips. Activities performed by Environmental Test Systems involve the use of certain volatile organic compounds or hazardous

substances that require reporting to various regulatory agencies that are task with providing information on issues related to air quality under provisions of the Clean Air Act. WPE's review of the Elkhart County Health Department files indicated that Environmental Test Systems had received a Notice of Violation from the Indiana Department of Environmental Management on July 15, 1997 regarding an exceedence of the total VOC air emission limit of 14.9 lbs/day. A subsequent IDEM inspection of the facility on August 19, 1997 concluded that there were no violations under the facility's air permit. As such, no corrective action was deemed necessary.

Five orphan sites were identified during the list search. Orphan sites are those sites that are not mapped by EDR due to poor or inadequate geocoding information. A review of the identified orphan listings indicates that none of the sites are located within the subject site's upgradient watershed and/or are greater than one-mile from the subject site.

5.0 SITE INFORMATION AND USE

Wightman Petrie Environmental, Inc. performed a site and vicinity reconnaissance, conducted interviews and reviewed available historical information in order to evaluate the current and historical uses of the site and surrounding properties and to evaluate past or present activities of potential environmental concern. The following sources are referenced:

- USGS Topographic Map, Elkhart, Indiana Quadrangle, dated 1961, photorevised 1981;
- Aerial Photographs, dated 1983, 1986 and 1993 reviewed at the Elkhart County Administrative Offices, Dunlap, Indiana;
- Septic Tank/Building Permit Files, Elkhart County Health Department, Dunlap, Indiana;
- Aerial Photograph, dated April 17, 1958, Chicago Aerial Survey of the City of Elkhart, Indiana reviewed at the Elkhart Municipal Building;
- Polk City Directories, dated 1990, 1991/1992, 1994, 1996, 1998 and 2000, reviewed at the Elkhart Public Library;
- Robinson's Elkhart County Rural Directory, dated 1977, reviewed at the Elkhart Public Library;
- Phase I Environmental Site Assessment, Environmental Test Systems, Inc., Elkhart, Indiana, dated August 1999, as prepared for Danaher Corporation by Blasland, Bouck & Lee, Inc.;
- Phase II Environmental Site Assessment, Environmental Test Systems, Inc., Elkhart, Indiana, dated August 1999, as prepared for Danaher Corporation by Blasland, Bouck & Lee, Inc.;
- Hazardous Waste Manifests documenting the transport and disposal of wastes from the Environmental Test Systems facility, dated January 23, 2003, August 20, 2003 and March 22, 2004, as provided by Ms. Jean Davis of Environmental Test Systems, Inc.

Conley B. Phifer, environmental professional with Wightman Petrie Environmental, Inc. experienced in environmental site assessments, conducted site and area visits on September 7, 2004. Ms. Jean Davis, Business Unit/Marketing Administrator for Environmental Test Systems,

Inc, accompanied WPE on our site visit. The site reconnaissance was performed on foot and the area reconnaissance was a driving tour on public-access routes.

5.1 CURRENT SITE USE

The subject site, totaling approximately 4.4 acres, has been developed with three interconnected concrete slab, steel frame and metal sided buildings, as well as paved parking lots for employees and visitors located along the eastern and northern property boundaries. Access to the facility is via an entrance drive off of County Road 106, located immediately south of the subject site. Historically, we note that the first phase of building construction was initiated in 1985, with the additions of Building #2 and the larger Building #3 occurring in 1989 and 1994, respectively. Overall, a total of approximately 35,545 square-feet of building are under roof.

Environmental Test Systems, Inc. historically performed manufacturing operations associated with the production of paper test strips. The majority of finished products (60 percent) historically manufactured by Environmental Test Systems for storage at the subject site were associated with the chemically coated disposable strips for the testing of waters (i.e., chlorine levels, pH, alkalinity, etc.) for the pool and spa industry under the brand name of AquaCheck. Approximately 25 percent of the finished products sold were utilized to test chloride levels in mortar under the brand name QuanTab. The remainder of finished products sold included test strips for the testing of chemical levels in soil, industrial water and automotive fluids. We note that with the purchase of Environmental Test Systems, Inc. by Hach Chemicals in 1998, manufacturing operations at the facility were phased out and subsequently transferred to Hach Chemical's facilities in Ames, Iowa. Currently the facility serves as a research and development operation for new and/or improved test strip applications. Marketing operations for the sale of test strips are also conducted from the facility. We note that with the transfer of manufacturing operations from the facility, current Environmental Test Systems operations are generally confined to Building #2, with Building #1 currently unoccupied. Building #3 is currently being converted as a machine tool (cutting tools) operation by Riverside Tool, Inc., the potential purchaser of the property. According to Ms. Jean Davis of Environmental Test Systems, future plans call for the transfer of the Instrumental Laboratory, Wet Chemistry Laboratory, and marketing offices from Building #2 to Building #1, with continued conversion of Building #3 and Building #2 to Riverside Tool machining operations.

Much of the test strip manufacturing equipment, as documented by the Blasland, Bouck & Lee Phase I Report of August 1999, has been removed from the facility, with subsequent transfer to Hach Chemical in Ames, Iowa. The following presents a summary of former and current operations, as noted, at the facility:

Building #1

Former Mix Room (First floor) – formerly used to prepare chemical reagents used to produce test strips. Equipment removed, currently empty with exception of storage for chemicals no longer used at facility. Ultimate disposition to be determined.

Former Dryer #1 (First floor) – utilized to dry chemical reagents after they were added to test strip paper. Operation resulted in the emission of VOCs through stack to outside, formerly regulated under IDEM air permits. Dryer equipment removed, currently empty.

Former Foiler Room (First floor) – contained equipment used to package test strips individually in foil. Equipment removed, currently empty.

Former Raw Materials Storage (First floor, open area) – manufacturing materials storage on racks along exterior walls (rolls of paper, polystyrene, etc.). Currently utilized for general storage and outdated materials.

Former QA Sample Storage Area (Second floor) – storage of samples of finished products for future QA testing and potential product liability issues. Currently empty.

Mechanical Room (Second floor) – equipment used to condition outside air prior to use in Dryer #1 (i.e., moisture removal). Air compressors remain within room

Office areas and Conference Rooms - Vacated

Building #2

Former Light Box Room (First floor) – housed light boxes that were utilized to simulate different types of light (sunlight, fluorescent light). Light boxes used to test precision of color-change in test strips under specific light conditions, as well as test strip stability under varied temperature conditions. Light boxes removed.

Former Quantab Room (First floor) – test product involving the lamination of specific test strips. Housed equipment to assemble and laminate Quantab Test Strips. Equipment removed, currently empty.

Former Hazardous Waste Storage Area (First floor open area) – wastes generated at the facility were collected and stored for subsequent disposal. Such wastes historically included scrap paper that had been treated with reagents, leftover chemical reagents from manufacturing, flammable liquids, non-regulated liquids and lab-packs of outdated chemicals from R & D operations. Currently empty.

Former Raw Material/Finished Product Storage (First floor, open area) – storage of large rolls of paper and finished test strips for shipment. Currently empty.

Wet Labs (First floor) – two typical wet chemistry labs utilized for research and development operations. Remains active as research and development area as of current date.

Instrumentation Lab (First floor) – houses chemical testing equipment and computer systems. Remains active as research and development area as of current date.

Miscellaneous Storage (Second Floor) – utilized for storage of empty 55-gallon drums, empty cardboard containers, computer equipment office equipment, record files. Remains active as of current date.

Walk-In Cooler (Second floor) - storage of small quantities of reagents and chemicals used by the facility (research and development and/or additive reagents used in manufacture) that require refrigeration. Remains active as of current date.

Office area/Conference Rooms – Currently housing office and sales staff

Building #3

Former Mix Room – formerly used to prepare chemical reagents that were applied to paper in production of test strips. Housed chemicals that included reagent alcohol, citric acid, and hydrochloric acid. Equipment removed.

Former Dryer #2 – unit formerly utilized to dry paper following application of specific reagents. Emissions of VOCs to outside air. Equipment removed.

Former Slitting and Assembly Room – larger rolls of chemically treated paper were slit into smaller width rolls. Chemically treated paper then adhered to 5-inch by 10-inch cards, with each card including several strips of paper treated with different chemical reagents. Equipment removed.

Former Fill and Cap Room – 5 inch by 10-inch cards were placed into a cutting machine and cut into individual test strips. Grouping of 50 test strips were transferred to plastic bottles and capped. Once filled the bottles were removed from a conveyor, labeled and placed into cardboard boxes for storage. Equipment removed.

Former Finished Product Storage – Boxes of test trips loaded to wooden skids for storage and eventual shipment.

Office Area – currently in transition for use by Riverside Tool.

The following conditions, as noted during WPE's site reconnaissance, were specifically assessed for their potential to create environmental concern.

5.1.1 Storage Tanks

Underground or aboveground storage tanks were not identified during the site reconnaissance. According to Ms. Jean Davis, there have not been underground or aboveground storage tanks associated with the operations of Environmental Test Systems, Inc. at the subject facility. The regulatory database search performed by WPE did not identify the presence of underground storage tanks associated with the 23575 County Road 106 address. According to the Blasland, Bouck & Lee Phase I Report, a former underground concrete containment tank, installed along the western side of Building #3 was utilized to contain any potential liquid spills from Dryer Unit #2 during manufacturing operations. A catch basin beneath Dryer #2 was designed to convey liquid to the tank. According to ETS personnel familiar with manufacturing operations at that time (1999), the catch basin was sealed and the concrete containment tank removed from the ground (tank had no outlet connections and was not used prior to removal).

5.1.2 Hazardous and Petroleum Products Containers/Drums

Historical manufacturing operations conducted by Environmental Test Systems, Inc resulted in the generation of four general waste streams, as follows:

- Hazardous solids consisting primarily of scraps of paper treated with reagents such as chromium, silver and arsenic;
- Hazardous liquids consisting of leftover chemical reagents such as chromium, silver and arsenic;
- Flammable liquids consisting of leftover chemical reagents such as organic solvents (i.e., primarily reagent alcohol, which contains 90% ethyl alcohol, 5% isopropyl alcohol and 5% methanol) and small quantities of acetone, ethyl acetate, isopropyl alcohol, methyl ethyl ketone and toluene;
- Non-regulated wastes

We note that the research and development laboratories, which currently remain in operation at the subject site, also generate quantities of alcohols and other waste reagents which are accumulated within various 5-gallon containers for subsequent off-site disposal by a licensed hazardous waste contractor, typically twice per year. Small quantities, typically less than 1-liter, are generated by the laboratory operations on a daily basis. Other chemicals that may become outdated, are leftover, or are solid wastes generated from research and development operations

are disposed of via lab-pack operations by a licensed hazardous waste contractor on an as needed basis.

In addition to the aforementioned chemical reagents within the two research and development (wet labs) and instrumentation laboratories, and waste chemical accumulations present within the 5-gallon containers in Research and Development Laboratory #1 (stored atop of a secondary containment basin); WPE also noted the presence of an accumulation of waste chemicals within what previously served as the Mix Room within Building #1. According to Ms. Davis the chemicals (pints, quarts, gallons, 5-gallon sized containers) are outdated and or no longer needed by research and development operations. As such, the facility is awaiting instruction from Ames, Iowa to determine if the identified chemicals are to be disposed of (likely as hazardous waste) or shipped to the manufacturing operations at Ames, Iowa. In any event, WPE recommends that the "waste chemicals" be removed from the former Mix Room area. Although some staining of the floor within the Former Mix Room was visually apparent, such staining was associated with former manufacturing operations and not with any release from the storage of the aforementioned chemicals. WPE also noted a walk-in cooler on the mezzanine level of Building #2 that was being utilized for the storage of various standard solutions and/or reagents. Staining or spillage associated with the storage of chemicals within the walk-in cooler was not identified.

Within the former Air Compressor Room, WPE identified the presence of a 5-gallon can of lubricating oil utilized in the maintenance of the two air compressor systems. WPE did not identify significant staining in the general area of the air compressor systems.

5.1.3 Heating and Cooling Fuels and Chemicals

Various natural gas fired furnace systems are present throughout the three building complex (various heating zones). In addition the shipping and warehousing areas are equipped with overhead radiant heating units (natural gas fired). Northern Indiana Public Service Company (NIPSCO) provides natural gas for the subject site. Air conditioning is provided to the various office areas and laboratories, with condenser units present along the exterior walls. Chemicals associated with the operation of heating and cooling systems were not identified during the reconnaissance of the subject site.

5.1.4 Solid Waste

Himco, Inc provides solid waste services for ongoing Environmental Test Systems, Inc. operations on an as-needed basis. Solid waste services for initial conversion of Building #3 by Riverside Tool are provided by BFI, Inc. During the site reconnaissance, WPE noted the presence of two 8 cubic yard dumpsters (side by side) at a paved access inlet, located along the eastern property boundary, across from Building #3. A roll-off dumpster (15 cubic yard) was also noted within the ramp access dock to Building #3. The roll-off dumpster was being utilized by Riverside Tool Inc. for collection of materials associated with its conversion of Building #3. Visually, WPE did not identify the presence of hazardous materials in any of the three solid waste containers.

5.1.5 Sewage Disposal/Septic Tanks

Although the subject site is currently connected to the municipal sanitary sewer system (City of Elkhart), historically, we note the use of two septic systems, reportedly located at the south and east sides of Building #1 and Building #2. Municipal sanitary sewer services were provided to the area of the subject site in 1992. It should be noted that Building #3 was connected to the municipal sanitary sewer system at the time of construction (1994).

WPE was able to obtain documentation regarding the location of the septic system south of Building #1 through a review of records at the Elkhart County Health Department, although no records were readily available regarding the exact location of the second septic system (east of Building #2) through the County Health Department. General locations of both former septic systems were documented within the Phase II Environmental Site Assessment conducted by Blasland, Bouck & Lee (August 1999). We note that the southern septic system was located within the grassy area located between the southernmost wall of Building #1 and County Road 106, whereas the eastern septic system was located within the landscaped area that generally serves as an entrance to Building #2.

According to the Blasland, Bouck & Lee Phase I Environmental Site Assessment, liquid from the septic system on the east side of Building #2 was sampled in 1992 and revealed the presence of toluene at 54 parts per billion (ppb), whereas the liquid from the septic system located at the south side of Building #1 revealed the presence of 1,1-dichloroethene (1,940 ppb) and 1,1,1-trichloroethane (2,770 ppb). With connection to the municipal sanitary sewer system in 1992,

both of the septic systems were reportedly emptied, crushed and abandoned in place by Environmental Test Systems. A manhole was noted on the east side of Building #1 to allow for the City of Elkhart to sample effluent wastewater from the facility prior to discharge to the sanitary sewer system.

Based upon a concern of potential environmental impact to soil and groundwater resulting from the historical use of the two septic systems, as evidenced by the presence of volatile organic compounds by the 1992 sampling effort, Blasland, Bouck & Lee's Phase I Environmental Site Assessment recommended additional investigation of the former septic systems. The results of such investigation, involving the sampling of soils and groundwater from a total of six temporary monitoring wells (Geoprobe) were documented within the Blasland, Bouck & Lee Phase II Environmental Site Assessment, dated August 1999. The following summarizes the findings of the investigation activities:

- Two volatile organic compounds (VOCs), acetone and toluene, were detected in soil samples collected from the ETS property. The acetone detections are believed to be due to laboratory contamination since acetone was also detected in the associated laboratory blank at similar concentrations. Acetone and toluene were detected in one or more soil sample analyzed, at concentrations of 22 micrograms per kilogram (ug/kg) and 9 ug/kg, respectively, which are below the Tier I Soil Closure Levels for acetone and toluene, as provided in the Draft Technical Resource Guidance Document prepared by the Indiana Department of Environmental Management (IDEM).
- Four semi-volatile organic compounds (SVOCs), diethylphthalate, di-n-butylphthalate, bis(2-ethylhexyl)phthalate and di-n-octylphthalate, were detected in soil samples collected from the ETS property. All of these SVOCs were also detected in the associated laboratory blank sample; therefore these particular compounds are believed to be indicative of laboratory contamination.
- Metals were detected in soil at concentrations within the reported background range for the Eastern United States (United States Geological Survey [USGS], 1984, and below their respective Draft Tier 1 Soil Closure Levels (IDEM, 1999).

- The VOCs acetone, methylene chloride and toluene were detected at low part per billion concentrations in groundwater collected from one or more temporary wells. The acetone and methylene chloride detections are indicative of laboratory contamination, since both compounds were also detected in the associated laboratory blank sample at similar concentrations. Toluene was detected in groundwater samples collected from TW-1 and TW-2, at concentrations below the Draft Tier 1 Closure Level of 1,000 ug/l (IDEM 1999) and EPA Maximum Contaminant Level (MCL) of 1,000 ug/l.
- Eleven SVOC compounds were detected in groundwater samples collected from the site. Five of these compounds are believed to be due to laboratory contamination since these five compounds, bis(2-ethylhexyl)phthalate, butylbenzylphthalate, diethylphthalate, di-n-butylphthalate and di-n-octylphthalate, were also detected in the associated laboratory blank at similar concentrations. The remaining six compounds, including 2-methylnaphthalene, benzoic acid, isophorone, naphthalene, phenanthrene and phenol, were reported at concentrations below their respective Draft Tier 1 Groundwater Closure Levels (IDEM 1999).
- The metals aluminum, iron and manganese were detected in groundwater samples collected from all six temporary wells at concentrations above the USEPA Secondary Drinking Water Standards (EPA 1996). The metals arsenic, cadmium, chromium, lead and nickel were also detected in the groundwater sample collected from TW-3 at concentrations slightly above the MCLs and the Draft Tier 1 Groundwater Closure Levels. Arsenic and chromium are utilized in manufacturing operations conducted at the facility by ETS.

In general, Blasland, Bouck & Lee concluded, "while VOCs, SVOCs and metals were detected in soil and groundwater samples collected from the ETS property, the majority of the detections were either below EPA or Draft IDEM criteria, or within the regional range for the Eastern United States background metal concentrations. Given the limited sampling data and the focus towards locations with a higher potential for past releases, constituents that were above these criteria/concentrations appear to be localized. The potential impact, if any, from these areas is

assumed to be minimal for the following reasons: (1) The contaminant levels are relatively low, even near the assumed source areas, and (2) the properties are industrial in nature.

WPE has reviewed the data, as provided within the Blasland, Bouck & Lee Phase II Report, with respect to **current** Risk Integrated System of Closure (RISC) Levels established by the Indiana Department of Environmental Management (DEM) for soil and groundwater at Industrial Sites. Our review indicates that none of the concentrations of constituents detected in the soils in and around the two former septic systems exceeds current RISC Default Closure criteria for industrial sites. With respect to our review of the groundwater data, the concentrations of arsenic (0.106 mg/l) and lead (0.202 mg/l) detected in the groundwater sample collected from location TW-3 (southernmost septic leach field of south septic system, along County Road 106) exceeded the RISC Default Closure criteria for industrial sites of 0.05 mg/l and 0.042 mg/l, respectively. All other detected chemical constituents within the groundwater samples collected from the two former septic system locales were well below applicable RISC Default Closure criteria for industrial sites.

As previously indicated, both of the septic systems were pumped of freestanding liquids prior to their closure (by crushing) by Environmental Test Systems in 1992. Such closure coincided with the availability of municipal water and sewer systems to the area of the subject site in 1992.

Based upon the fact that exceedence of regulatory criteria was limited to groundwater only, and only in the southernmost leachfield of the former southernmost septic system, it would appear as though the contamination is extremely limited. Based upon this factor, the 1992 removal of the source of contaminants (i.e., removal of free-standing liquids), the elimination of potential exposure via ingestion of groundwater as a source of drinking water at the subject site and adjacent facilities (municipal water supply), and the elimination of the potential for continued or future release of contaminants (closure of septic systems and connection to municipal sanitary sewer system); it is WPE's assessment that the former septic systems (and associated leachfields) do not present any significant current risk to public health or the environment .that merit the need for any further investigation or remedial action at the subject site.

5.1.6 Hydraulic Equipment

No hydraulic equipment, other than the presence of a propane powered lift truck associated with the ongoing conversion of Building #3 by Riverside Tool, was noted during the site reconnaissance.

5.1.7 Contracted Maintenance Services

Economy Lawn Care, Inc. provides lawn maintenance services to the subject site on a weekly basis. Lawn maintenance equipment is not stored at the subject site. Pest management services are no longer provided to the subject site, although historically rodent control was provided through the placement of bait traps. Church Plumbing and Heating, Inc. provides maintenance for heating and cooling systems present at the subject site on an as-needed basis.

5.1.8 Electrical Transformers

Electrical transformers are a source of environmental concern due to the potential presence of polychlorinated biphenyls (PCBs) contained in dielectric fluids used in some units.

American Electric Power, Inc provides electrical power to the subject site. Two banks of three pole-mounted electrical transformers were noted along the western property boundary of the subject site. Each of the transformers was labeled as non-PCB. Additional banks of pole-mounted transformers were also present along the eastern property boundary with the adjacent (and former Environmental Test Systems) building, currently occupied by Elkhart Powder and Fab, Inc. Such transformers provided electrical service to that particular building as well as other various warehousing and manufacturing facilities within the Northland Industrial Park. Staining or other evidence of leakage of dielectric fluid was not observed in the area of any of the pole-mounted transformer units. Obvious labeling regarding PCB content of the transformers was not observed on the transformers along the eastern property boundary of the subject site. American Electric Power representatives have indicated in previous conversations that American Electric Power accepts responsibility for releases from its equipment.

5.1.9 Water Supply and Wells

The facility is currently connected to a municipal (City of Elkhart) water supply. However, prior to annexation and associated construction of public utilities to the Northland Industrial Park in 1992, the facility utilized on-site wells as a source of drinking and process related water

(subsequently closed). WPE noted the presence of a 2-inch water well immediately east of Building #1. According to Ms. Jean Davis, the well is utilized for the facility's fire protection sprinkler system. Specific details regarding the well's construction were not available to Wightman Petrie Environmental for review. The day tank and water control valves for the remaining well were noted within the warehouse/storage area of Building #1 (eastern interior wall).

5.1.10 Drains and Sumps

Floor drains were noted within the wet labs and instrumentation lab of Building #2. We note that all floor drains are currently connected to the municipal sanitary sewer system. Visual indications of staining or other evidence of releases, discharges or spills to the floor drains were not identified during the reconnaissance of the laboratory areas. WPE also note the presence of a sump system within the area of the Former Mix Room in Building #3. The sump did not appear to have an outlet and was primarily installed as a collection system for any materials that may have been spilled during mixing operations as part of the former manufacturing processes. WPE did not observe any visual indications of historical releases to the collection sump.

5.1.11 Pits, Ponds Lagoons and Surface Waters

As previously noted, there exists a stormwater ditch located at the southern property boundary of the subject site, along County Road 106. A drainage swale is also present at the northern property boundary that conveys surface water runoff eastward and then southerly along a portion of the eastern property boundary toward a common drainage ditch shared by adjacent properties. A review of the original Site Plan for Building #1 (1985) highlights the presence of three retention areas on the subject site. These areas are present along the southern and western property boundary (Retention Area #1), at the southeastern corner of the subject site (Retention Area #2) and along the eastern property boundary (Retention Area #3). The total volume of retention was identified as being 13,650 cubic feet. WPE notes that Retention Area #3 has been eliminated through the subsequent construction of Building #2 and associated parking areas. However, based upon visual observations at the time of the reconnaissance, it would appear as though low-lying areas consistent with the identified Retention Areas #1 and #2 remain. WPE also noted a low-lying area to the north of the existing parking area (north of Building #3) that allows for subsequent runoff to the aforementioned drainage swale present at the northern property boundary of the subject site. No other pits, ponds, lagoons, or areas for surface water collection were observed on the subject site.

5.1.12 Staining

Wightman Petrie Environmental's reconnaissance of the subject site did not identify any areas of significant staining on the subject site or within the existing building.

5.1.13 Stressed Vegetation

Indications of stressed vegetation were not observed on the subject site.

5.1.14 Odors

No unusual odors were detected during the site reconnaissance.

5.2 PAST SITE USE

Historically, Environmental Test Systems was formerly a division of Miles Laboratories, Inc. In 1985, Mr. Harry Stephenson purchased the division and relocated operations to the County Road 106 locale (Building #1 completed in 1986). Environmental Test Systems, Inc. was eventually purchased by Hach Company (based in Ames, Iowa) in April 1998, and continues to operate as a wholly owned subsidiary of Hach Company through current date.

With respect to historical property use, the 1958 aerial photograph indicates that the subject site was utilized as agricultural farmland. The 1983 aerial photograph indicates some initial clearing of the subject property for development as part of the Northland Industrial Park. The 1986 (Spring) aerial photograph indicates the presence of Building #1, located immediately north of, with access from, County Road 106. The 1993 aerial photograph confirms expansion of operations at the facility to include Building #2 (construction actually completed in 1989). A review of the Michiana Area Council of Governments (MACOG), Geographic Information System (GIS) aerial photography from 1998 and 2002 confirms the presence of Building #3 (construction actually completed in 1994) and associated parking lot, north of Building #3.

A review of the Elkhart County Health Department records for the subject site indicates approval of a Development Permit Application for Environmental Test Systems, with Almac Construction as the General Contractor, dated December 2, 1985. The document also confirms completion of the septic system, located within the grassy area south of the building and north of County Road 106, as of April 18, 1986.

A review of the 1977 Robinson Directory indicates the presence of residential dwellings along County Road 106, with no specific listing of the 23575 County Road 106 address. According to the Polk City Directories, Environmental Test Systems, Inc. has occupied the 23575 County Road 106 facility since at least 1990.

According to historical information obtained from the Elkhart County Assessor's Office, as presented in the Blasland, Bouck & Lee Phase I Environmental Site Assessment, the following table summarizes a record of historical ownership of the subject property:

OWNER	DATES OF OWNERSHIP
Environmental Test Systems, Inc.	1991 through current date
G & S Properties	1986 – 1991
Ludwig, Allan J & David J. Miller	1986
Delcorp, Inc.	1985 – 1986
Ludwig, Allan J & David J. Miller	1985
Bennet, Steve R.	1983 – 1985
Ludwig, Allan J & David J. Miller	1983
Dawn Realty	1983
Century Motor Coach	1983
Dygert, David L. & Phyllis B.	1973 – 1983
Baker, Ernest R. & Minola A.	1962 – 1973

5.3 SURROUNDING LAND USE

Nearby property usage could potentially impact the surface and subsurface conditions of a property. Developing a history of past to present uses or occupancies of surrounding property can provide an indication of the likelihood of environmental concern.

5.3.1 North

North of the subject site is a wood line that serves as the northern property boundary of the subject site. Further to the north are the operations of the Norcold Warehouse (storage location for materials associated with the manufacture of refrigerator systems for recreational vehicles, 23666 Cooper Drive), and Cooper Drive. To the northeast of the subject site are the rear

portions of the Dygert Seating facility (manufacture of seating for the recreational vehicle industry, 53381 Marina Drive), the ABI Plastics facility (injection molding, 23620 Cooper Drive), a vacant building (23542 Cooper Drive, formerly Partner Supply, Inc., a distributor of wooden furniture products), Shepherd Distribution Company (53293 Marina Drive), and the intersection of Cooper Drive and Marina Drive. To the northwest of the subject site are the facilities of Ashland Chemical Distributors (a distributor of specialty chemicals, 23740 Cooper Drive) and the intersection of Ada Drive and Cooper Drive.

According to the historical sources reviewed, the area to the north, northeast and northwest of the were utilized for agricultural purposes through at least the mid-1970s, at which time initial stages of the Northland Industrial Park were constructed. A review of city directories and historical aerial photographs indicates property use to the north, northeast and northwest have remained essentially consistent with current land use.

5.3.2 East

To the east of the subject site is a steel-framed building (23537 County Road 106) that until recently (2003) served as a warehouse for finished products and manufacturing waste materials (disposed of prior to recent sale of property) by Environmental Test Systems, Inc. and a Native Hardwoods, Inc. (a manufacturer of wooden partitions and cabinetry for the recreational vehicle industry). The facility is currently operated as Elkhart Powder Coating and Fabrication, Inc. (coating and fabrication of metal frames for the recreational vehicle industry). Further to the east are a large grassy area and the operations of Marine Fasteners Midwest, Inc. (distributor of marine related fastening systems to the boating manufacture industry, 53471 Marina Drive) and the intersection of Marina Drive and County Road 106.

A review of the 1958 historical aerial photograph indicates the area to the east of the subject site to have been utilized for agricultural purposes, with several farmhouses noted as being present along County Road 106, east of the subject site. The 1983 and 1986 (Spring) aerial photographs indicate the property immediately adjacent (east) of the subject site as being cleared, although no structural development had been undertaken. The 1993 aerial photograph indicates the presence of the adjacent building (23537 County Road 106) and the 53471 Marina Drive buildings to be present and consistent with their current configurations.

A review of the 1977 Robinson's Elkhart County Rural Directory indicates the presence of residential properties along County Road 106. Marina Drive to the east, Ada Drive to the west and Cooper Drive to the north of the subject site were not listed in the directory. A review of the Polk City Directories for the City of Elkhart did not indicate any listings for the 23537 County Road 106 property until 1990, as the area had not been annexed by the City of Elkhart. The 1990 city directory indicates the 23537 County Road 106 building was occupied by Conversion Components, Inc., a supplier of recreational vehicle accessories. Conversion Components continued to be located at the subject site through at least 1994. The 1996 city directory indicates the presence of Intek International, also a recreational vehicle supplier. By 1998, through at least 2000, the city directories indicate occupancy by Native Hardwoods, Inc. Native Hardwoods, Inc. apparently occupied the front portion of the subject site building from May 1998 through at least March 2003. The rear portion of the building was occupied by Environmental Test Systems, Inc. from at least May 1998 through at least December 2002.

According to city directories, the 53471 Marina Drive address was occupied by LaSalle RV Products Outlet, a distributor of recreational vehicle accessories, from at least 1990 through 1998, with Marine Fasteners Midwest occupying the facility from at least 2000 through current date. The 53471 Marina Drive facility was listed as being occupied by Foremost Enterprises, a manufacturer of recreational vehicle seating, from at least 1990 through at least 1998.

5.3.3 South

To the south, southeast and southwest of the subject site are County Road 106 and a residential subdivision with two entrances off of County Road 106. We note that the subdivision extends southerly along the two access drives (Lane Street and Kershner Drive).

According to the 1958 aerial photograph, the property to the south of the subject site was utilized as agricultural farmland, although some farmhouses were noted as being located along County Road 106, south of the subject site. The 1983 aerial photograph indicates Phase I of the residential subdivision along Lane Street and Kershner Drive. The 1986 (Spring) aerial photograph indicates continued expansion of the residential subdivision. The 1993 aerial indicates continued expansion of the subdivision, inclusive of the southerly extension of both Lane Street and Kershner Drive. The 1998 and 2002 aerial photography indicates property use that is consistent with current date (continued residential)

A review of the 1977 Robinson's Elkhart County Rural Directory confirms the presence of residential properties along County Road 106. Similarly, a review of the Polk City Directories confirms the residential subdivision from at least 1990 (annexation date) through current date.

5.3.4 West

To the west of the subject site are the manufacturing and shipping facilities (separate buildings) of Voyager, Inc. at 53468 Ada Drive (steel frame manufacture for chairs), the facilities of X-Treme Vinyl Solutions (formerly AQI Products, Inc) at 53386 Ada Drive and Ada Drive and County Road 106. Across Ada Drive are the manufacturing facilities of Kellmark at 53465 Ada Drive (calendar productions).

A review of historical aerial photography indicates the presence of all facilities west of the subject site to be present as of 1990, with actual construction of the facilities occurring between 1985 and 1986. Prior to construction of the facilities property use to the west of the subject site was agricultural in nature.

6.0 CONCLUSIONS

Based on the information made available to Wightman Petrie Environmental, Inc. or obtained during our assessment of the subject property, there are no indications that current or past uses of the subject site and its surrounding properties have resulted in significant environmental impairment of the subject site. We note that two previously existing septic systems utilized at the subject site were closed in 1992 (removal of liquids, crushing of system components, backfilling with stone). It is WPE's assessment that such actions eliminated any continued source of any ongoing contamination. Based upon this, and the fact that the facility and surrounding properties have since been connected to public water and sewer systems (1992), thereby eliminating a potential for uptake via drinking water, and the limited nature of the contamination identified (contamination not widespread across the subject site, groundwater at one location only); WPE does not consider such contamination, as identified by the former Phase II Environmental Site Assessment (Blasland, Bouck & Lee – 1999) as having resulted in a significant impact to the subject property or surrounding properties (no significant current risk to public health or the environment). As such, no further assessment of the subject site is deemed warranted at this time.

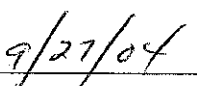
WPE does recommend that the final disposition of chemicals that are no longer being used at the facility (currently stored in Former Building #1 Mix Room) be determined, with appropriate forwarding to the Ames, Iowa facility and/or appropriate disposal undertaken. We would also recommend that chemicals stored within the laboratory be evaluated as part of the eventual transfer to Building #1, and that any chemicals determined to be outdated or no longer utilized be disposed of in accordance with applicable disposal requirements via a licensed hazardous waste contractor.

7.0 CERTIFICATION

- 1) Wightman Petrie Environmental, Inc. certifies to RJM Enterprises, LLC that this Phase I Environmental Site Assessment for the subject property, located at 23575 County Road 106 in Elkhart, Indiana, along with the activities performed in connection with its preparation was performed in general accordance with the ASTM Document E 1527-00 (the document) for Phase I Environmental Site Assessments.
- 2) Wightman Petrie Environmental, Inc. certifies to RJM Enterprises, LLC that this Phase I Environmental Site Assessment was prepared, and the activities performed in connection with its preparation were conducted by and under the direction, supervision and control of Conley Phiher, who qualifies as an "environmental professional" as defined by the document.
- 3) Wightman Petrie Environmental, Inc. certifies to RJM Enterprises, LLC that it has in effect at the time of the Phase I Environmental Site Assessment, and has maintained during the entire duration of the activities performed in connection with this Phase I Environmental Site Assessment, environmental consultants professional liability insurance coverage in an amount exceeding five hundred thousand dollars (\$500,000), issued by an insurance company licensed to do business in Indiana, which insurance policy provides coverage for the acts of errors and omissions of all persons involved in the performance and preparation of this Phase I Environmental Site Assessment and related activities. Wightman Petrie Environmental, Inc., covenants to RJM Enterprises, LLC that it shall maintain such insurance, without reduction in or narrowing of the described coverage, for at least one year after the date of the Phase I Environmental Site Assessment.

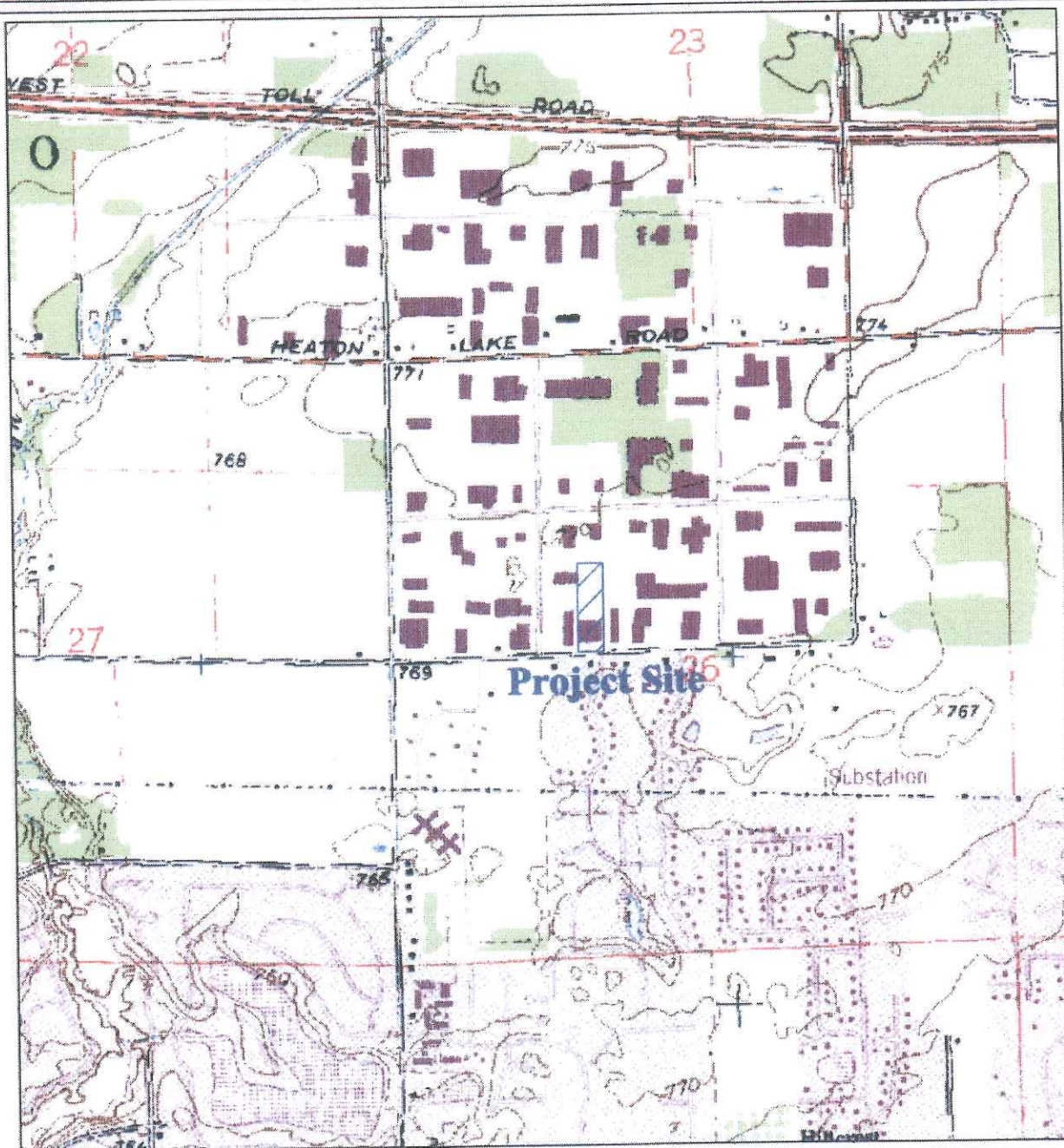


Conley B. Phiher
Sr. Project Manager



Date

APPENDIX A
FIGURES



Wightman Petrie Environmental

713 S Scott St.
PH. (574) 232-4388

South Bend, Indiana 46601
FAX (574) 232-4333

Date: 9-20-04

Received:

Drawn By: K LW

Scale: None

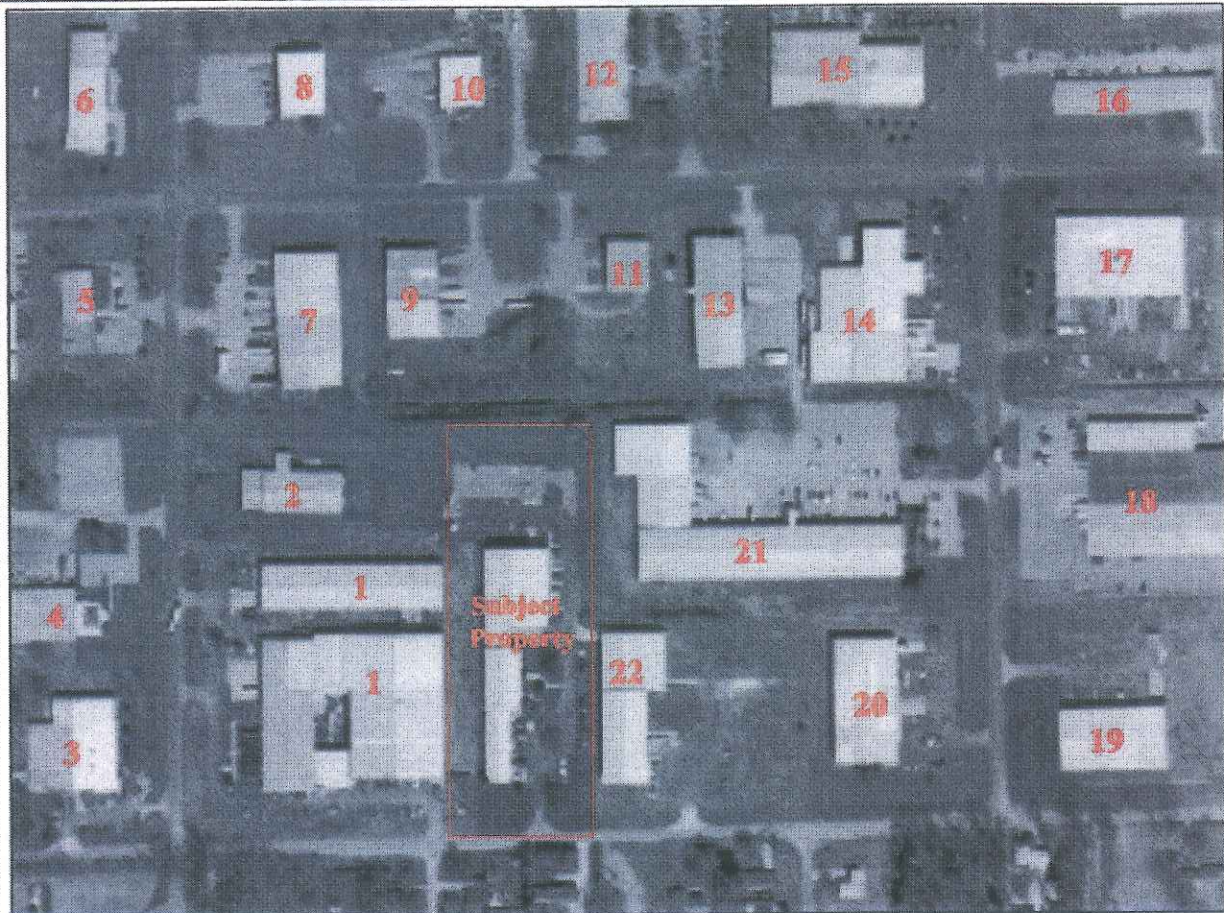
Approved By: CBP

23575 C.R. 106
Elkhart, IN

Title: Vicinity Map

Project No. 24134

Drawing No. Figure 1.0



LEGEND

1 = Voyager	9 = Norcold	16 = Chipco
2 = X-Treme Vinyl Solutions	10 = Elkhart Hitch	17 = Geocel
3 = Kellmark	11 = ABI Plastics	18 = Keyline Sales
4 = Ameritrans	12 = Robert Weed Plywood	19 = Geocel
5 = McDaniel Fire Systems	13 = Vacant	20 = Marine Fasteners Midwest
6 = Wiltfong Moving & Storage	14 = Shepherd Distribution	21 = Dygert Seating
7 = Ashland Chemical	15 = R.E. Jackson Windows	22 = Elkhart Powder Coating
8 = Transfer Precision Corp.		

Wightman Petrie Environmental

713 S Scott St.
PH. (574) 232-4388

South Bend, Indiana 46601
FAX (574) 232-4333

Date: 9-20-04	Received:	Drawn By: K LW
Scale: None		Approved By: CBP
23575 CR 106 Elkhart, IN		
Title: Area Property Use	Project No. 24134	Drawing No. Figure 2.0

APPENDIX B
PHOTOGRAPHS



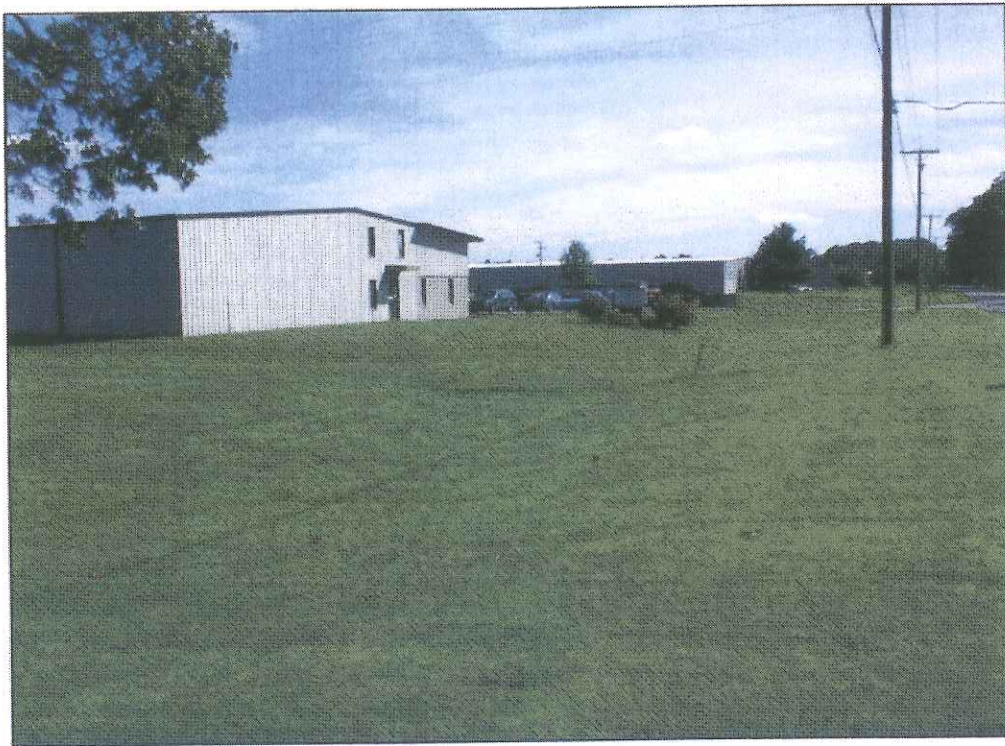
Subject Site - Exterior of Building #1



Subject Site - Exterior of Building #2 and Building #3



Subject Site - Parking area north of Building #3



Adjacent property use (east) - Elkhart Powder & Fab



Subject Site - Adjacent (west) of building, note stormwater runoff area



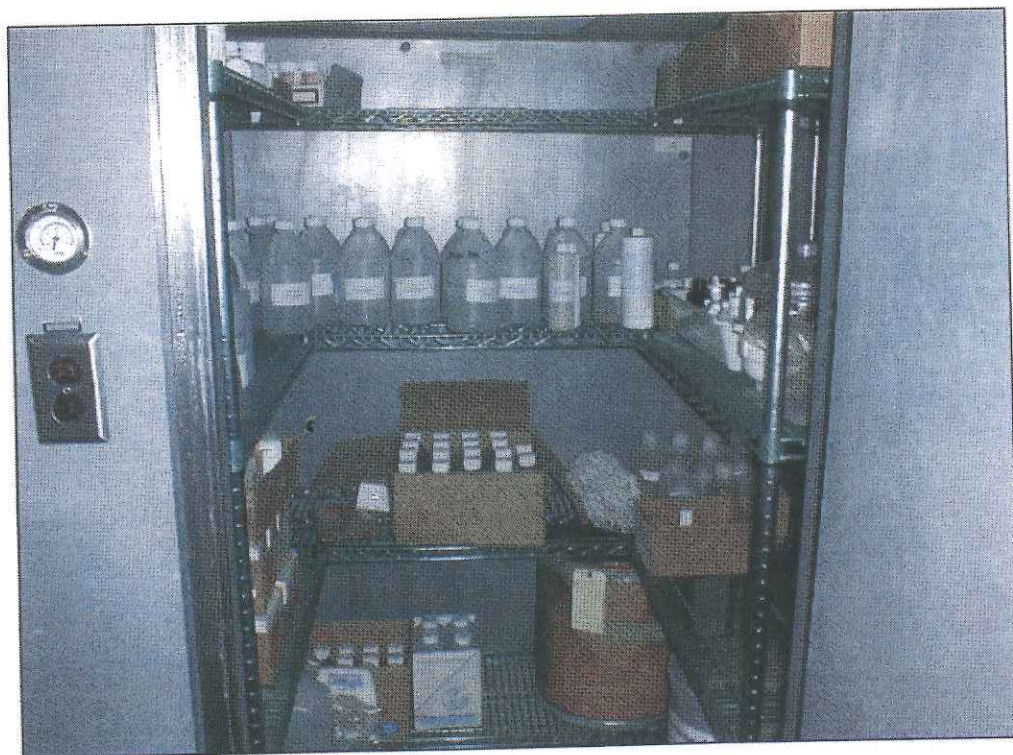
Loading area of Building #3, roll-off for Riverside Tool conversion



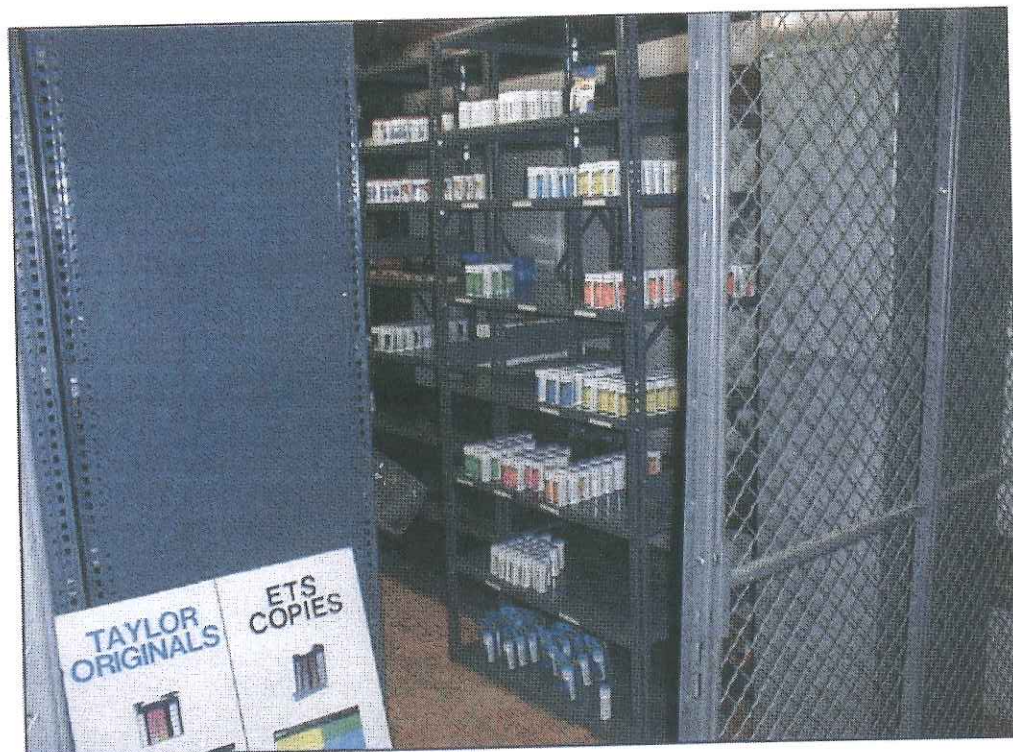
Subject Site - Solid waste dumpster(s)



Subject Site - Existing well for fore protection sprinkler system



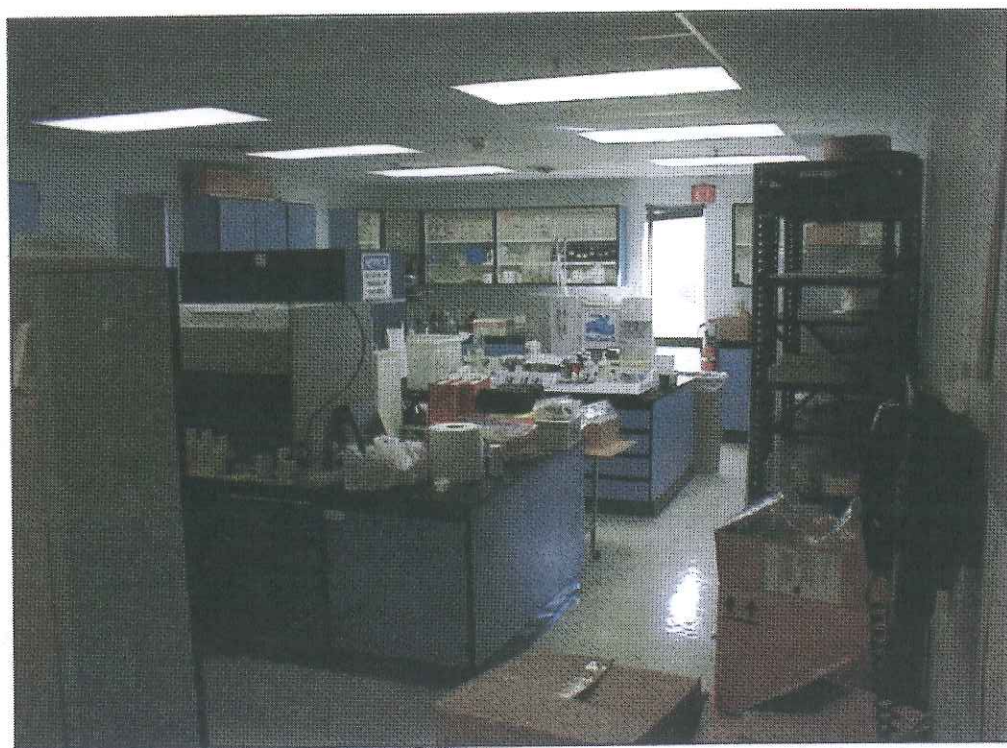
Building #2 (mezzanine level)- Sample/reagent refrigeration unit



Building #2 (mezzanine level) - product storage area



Building #2 - warehouse storage area



Building #2 - Instrumentation Laboratory



Building #2 - Product Development Lab #1



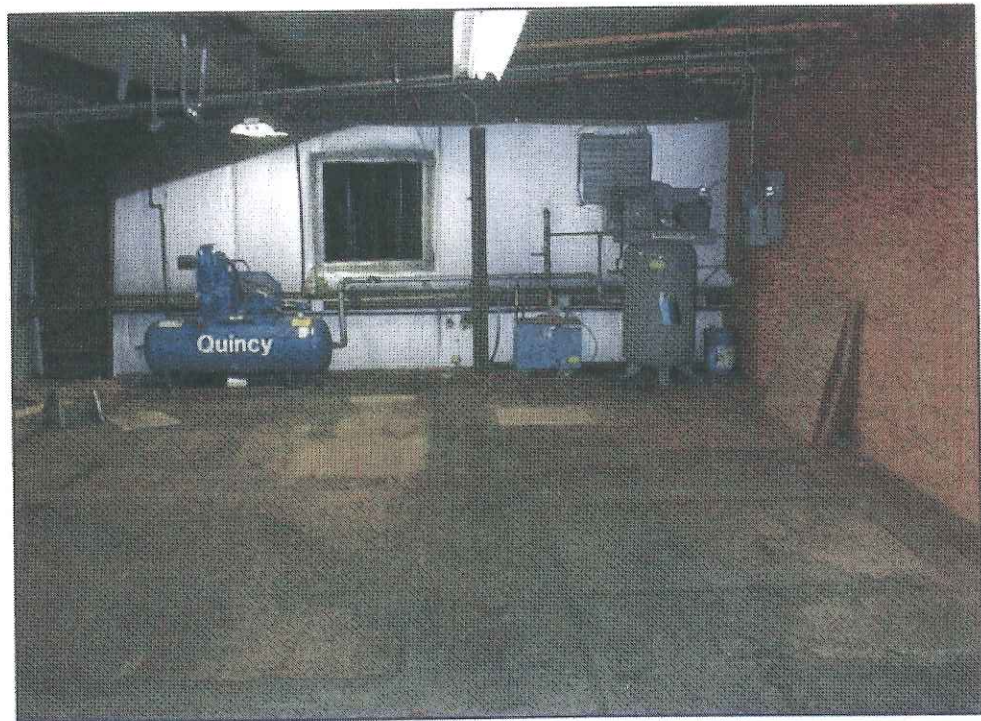
Building #2 - Laboratory waste accumulation area (secondary containment)



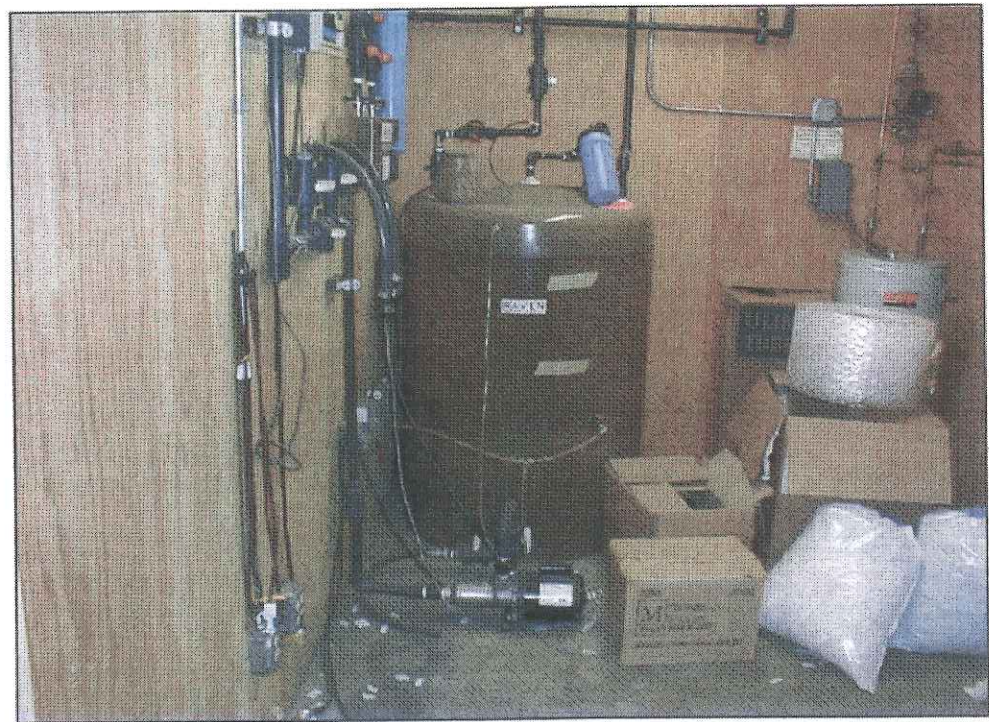
Building #1 - Former Mix Room, chemical accumulation area



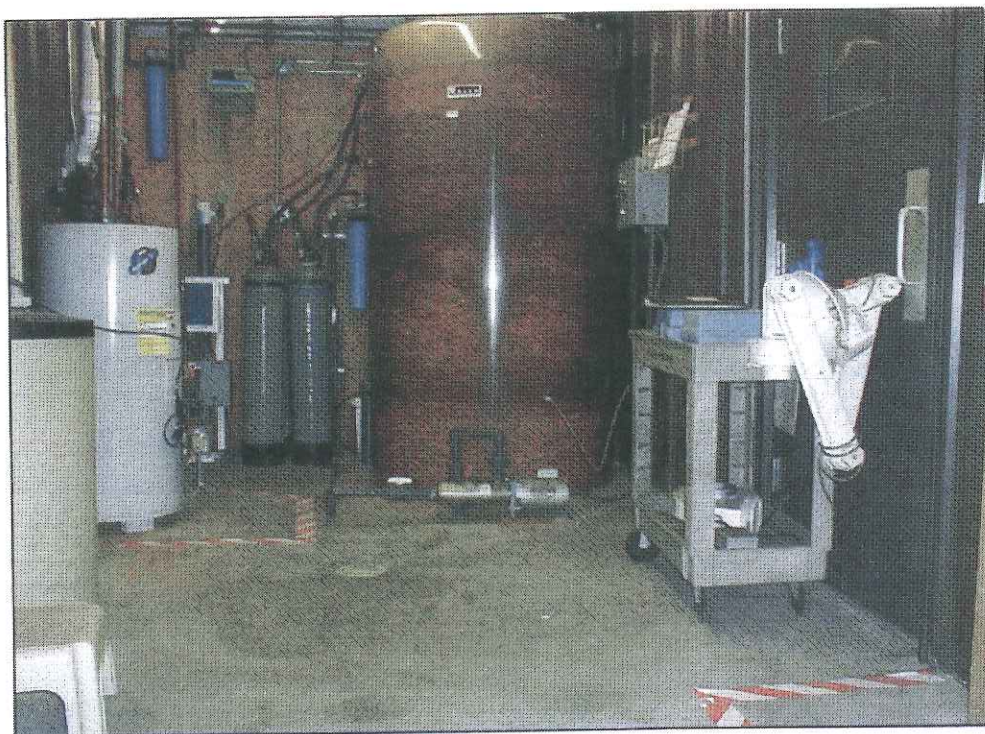
Building #1 - Main floor, office area



Building #1 - Air Compressor Room (note: 5-gallon machine oil)



Building #3 - Ultraviolet disinfection system (non-operational)



Building #2 - Reverse osmosis/distilled water unit for Lab



Building #1 - Warehouse storage area

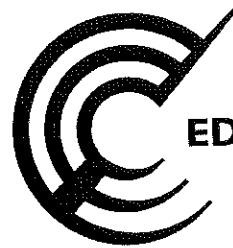


Building #3 - Area of Riverside Tool conversion



Building #3 - Riverside Tool milling machine set-up (typical)

APPENDIX C
REGULATORY SEARCH INFORMATION



EDR™ Environmental
Data Resources Inc

The EDR Radius Map™ Report

**Environmental Test Systems Facility
23575 County Road 106
Elkhart, IN 46514**

Inquiry Number: 01262825.1r

September 09, 2004

The Standard in Environmental Risk Management Information

**440 Wheelers Farms Road
Milford, Connecticut 06460**

Nationwide Customer Service

**Telephone: 1-800-352-0050
Fax: 1-800-231-6802
Internet: www.edrnet.com**

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Detail Map.....	3
Map Findings Summary.....	4
Map Findings.....	6
Orphan Summary.....	10
EPA Waste Codes.....	EPA-1
Government Records Searched/Data Currency Tracking.....	GR-1

GEOCHECK ADDENDUM

GeoCheck - Not Requested

Thank you for your business.
Please contact EDR at 1-800-352-0050
with any questions or comments.

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EXECUTIVE SUMMARY

A search of available environmental records was conducted by Environmental Data Resources, Inc. (EDR). The report meets the government records search requirements of ASTM Standard Practice for Environmental Site Assessments, E 1527-00. Search distances are per ASTM standard or custom distances requested by the user.

TARGET PROPERTY INFORMATION

ADDRESS

23575 COUNTY ROAD 106
ELKHART, IN 46514

COORDINATES

Latitude (North): 41.717200 - 41° 43' 1.9"
Longitude (West): 85.920500 - 85° 55' 13.8"
Universal Transverse Mercator: Zone 16
UTM X (Meters): 589799.4
UTM Y (Meters): 4618728.0
Elevation: 768 ft. above sea level

USGS TOPOGRAPHIC MAP ASSOCIATED WITH TARGET PROPERTY

Target Property: 41085-F8 ELKHART, IN
Source: USGS 7.5 min quad index

TARGET PROPERTY SEARCH RESULTS

The target property was identified in the following government records. For more information on this property see page 6 of the attached EDR Radius Map report:

<u>Site</u>	<u>Database(s)</u>	<u>EPA ID</u>
ENVIRONMENTAL TEST SYSTEMS INC 23575 CR 106 ELKHART, IN 46514	RCRIS-SQG FINDS	IND152094785

DATABASES WITH NO MAPPED SITES

No mapped sites were found in EDR's search of available ("reasonably ascertainable ") government records either on the target property or within the ASTM E 1527-00 search radius around the target property for the following databases:

FEDERAL ASTM STANDARD

NPL..... National Priority List
Proposed NPL..... Proposed National Priority List Sites
CERCLIS..... Comprehensive Environmental Response, Compensation, and Liability Information
System
CERC-NFRAP..... CERCLIS No Further Remedial Action Planned

EXECUTIVE SUMMARY

CORRACTS Corrective Action Report
RCRIS-TSD Resource Conservation and Recovery Information System
ERNS Emergency Response Notification System

STATE ASTM STANDARD

SHWS List of Hazardous Waste Response Sites Scored Using the Indiana Scoring Model
SWF/LF Permitted Solid Waste Facilities
LUST Lust Leaking Underground Storage Tank List
VCP Voluntary Remediation Program Site List

FEDERAL ASTM SUPPLEMENTAL

CONSENT Superfund (CERCLA) Consent Decrees
ROD Records Of Decision
Delisted NPL National Priority List Deletions
HMIRS Hazardous Materials Information Reporting System
MLTS Material Licensing Tracking System
MINES Mines Master Index File
NPL Liens Federal Superfund Liens
PADS PCB Activity Database System
DOD Department of Defense Sites
US BROWNFIELDS A Listing of Brownfields Sites
UMTRA Uranium Mill Tailings Sites
FUDS Formerly Used Defense Sites
INDIAN RESERV. Indian Reservations
RAATS RCRA Administrative Action Tracking System
TRIS Toxic Chemical Release Inventory System
TSCA Toxic Substances Control Act
SSTS Section 7 Tracking Systems
FTTS INSP FIFRA/ TSCA Tracking System - FIFRA (Federal Insecticide, Fungicide, & Rodenticide Act)/TSCA (Toxic Substances Control Act)

STATE OR LOCAL ASTM SUPPLEMENTAL

IN Spills Spills Incidents
BULK Registered Bulk Fertilizer and Pesticide Storage Facilities

EDR PROPRIETARY HISTORICAL DATABASES

Coal Gas Former Manufactured Gas (Coal Gas) Sites

BROWNFIELDS DATABASES

US BROWNFIELDS A Listing of Brownfields Sites
Brownfields Brownfields Site List
AUL Sites with Restrictions
VCP Voluntary Remediation Program Site List

SURROUNDING SITES: SEARCH RESULTS

Surrounding sites were identified.

EXECUTIVE SUMMARY

Elevations have been determined from the USGS Digital Elevation Model and should be evaluated on a relative (not an absolute) basis. Relative elevation information between sites of close proximity should be field verified. Sites with an elevation equal to or higher than the target property have been differentiated below from sites with an elevation lower than the target property. Page numbers and map identification numbers refer to the EDR Radius Map report where detailed data on individual sites can be reviewed.

Sites listed in ***bold italics*** are in multiple databases.

Unmappable (orphan) sites are not considered in the foregoing analysis.

FEDERAL ASTM STANDARD

RCRIS: Resource Conservation and Recovery Information System. RCRIS includes selective information on sites which generate, transport, store, treat and/or dispose of hazardous waste as defined by the Resource Conservation and Recovery Act (RCRA). Conditionally exempt small quantity generators (CESQGs): generate less than 100 kg of hazardous waste, or less than 1 kg of acutely hazardous waste per month. Small quantity generators (SQGs): generate between 100 kg and 1,000 kg of hazardous waste per month. Large quantity generators (LQGs): generate over 1,000 kilograms (kg) of hazardous waste, or over 1 kg of acutely hazardous waste from the generator off-site to a facility that can recycle, treat, store, or dispose of the waste. TSDFs treat, store, or dispose of the waste.

A review of the RCRIS-LQG list, as provided by EDR, and dated 06/15/2004 has revealed that there is 1 RCRIS-LQG site within approximately 0.25 miles of the target property.

<u>Equal/Higher Elevation</u>	<u>Address</u>	<u>Dist / Dir</u>	<u>Map ID</u>	<u>Page</u>
<i>ASHLAND CHEMICAL INC</i>	<i>23740 COOPER DR.</i>	<i>1/8 - 1/4NNW</i>	<i>7</i>	<i>8</i>

RCRIS: Resource Conservation and Recovery Information System. RCRIS includes selective information on sites which generate, transport, store, treat and/or dispose of hazardous waste as defined by the Resource Conservation and Recovery Act (RCRA). Conditionally exempt small quantity generators (CESQGs): generate less than 100 kg of hazardous waste, or less than 1 kg of acutely hazardous waste per month. Small quantity generators (SQGs): generate between 100 kg and 1,000 kg of hazardous waste per month. Large quantity generators (LQGs): generate over 1,000 kilograms (kg) of hazardous waste, or over 1 kg of acutely hazardous waste from the generator off-site to a facility that can recycle, treat, store, or dispose of the waste. TSDFs treat, store, or dispose of the waste.

A review of the RCRIS-SQG list, as provided by EDR, and dated 06/15/2004 has revealed that there are 4 RCRIS-SQG sites within approximately 0.25 miles of the target property.

<u>Equal/Higher Elevation</u>	<u>Address</u>	<u>Dist / Dir</u>	<u>Map ID</u>	<u>Page</u>
<i>KEYLINE SALES INC</i>	<i>53364 MARINA DR</i>	<i>1/8 - 1/4NE</i>	<i>6</i>	<i>8</i>
<u>Lower Elevation</u>	<u>Address</u>	<u>Dist / Dir</u>	<u>Map ID</u>	<u>Page</u>
<i>VOYAGER DAKAT INC</i>	<i>53468 ADA DR</i>	<i>0 - 1/8 W</i>	<i>A2</i>	<i>6</i>
<i>KELLMARK CORP</i>	<i>53465 ADA DR</i>	<i>0 - 1/8 W</i>	<i>A3</i>	<i>6</i>
<i>SHERRY DESIGNS</i>	<i>53387 ADA DR</i>	<i>1/8 - 1/4NW</i>	<i>B5</i>	<i>7</i>

EXECUTIVE SUMMARY

STATE ASTM STANDARD

UST: The Underground Storage Tank database contains registered USTs. USTs are regulated under Subtitle I of the Resource Conservation and Recovery Act (RCRA). The data come from the Department of Environmental Management's Indiana Registered Underground Storage Tanks list.

A review of the UST list, as provided by EDR, and dated 06/02/2004 has revealed that there is 1 UST site within approximately 0.25 miles of the target property.

<u>Lower Elevation</u>	<u>Address</u>	<u>Dist / Dir</u>	<u>Map ID</u>	<u>Page</u>
CHUPP & SONS CONVERSIONS	53387 ADA DR	1/8 - 1/4NW	B4	7

EXECUTIVE SUMMARY

Due to poor or inadequate address information, the following sites were not mapped:

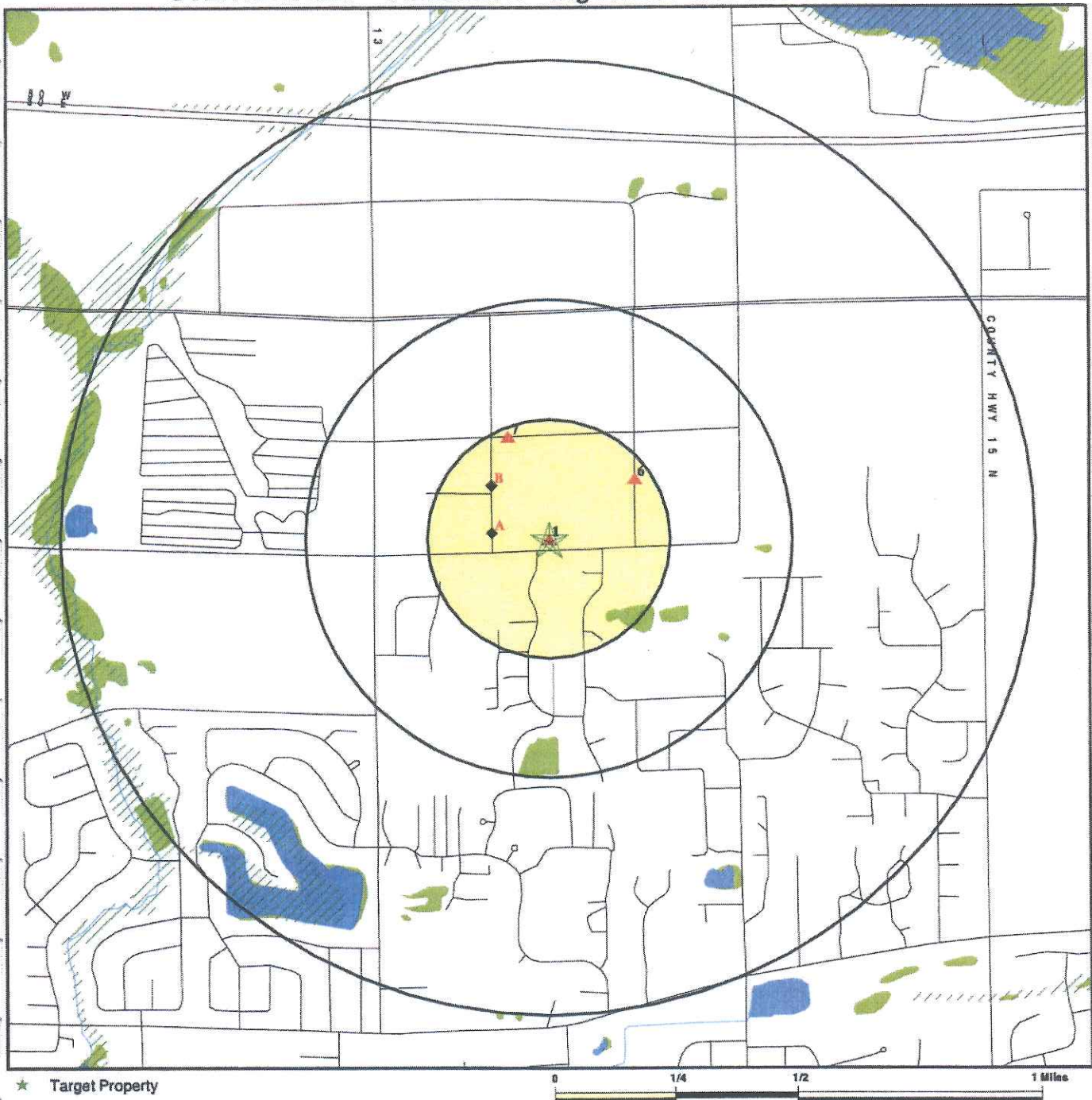
Site Name

LUSHER AVENUE
CIRCLE R
ELKHART SLUDGE FARM
HUDSON BUILDING SUPPLY
FIRESTONE #10NC

Database(s)

SHWS
CERC-NFRAP
CERC-NFRAP
IN Spills, UST
IN Spills, UST

OVERVIEW MAP - 01262825.1r - Wightman Petrie Environmental



- ★ Target Property
- ▲ Sites at elevations higher than or equal to the target property
- ◆ Sites at elevations lower than the target property
- ▲ Coal Gasification Sites
- National Priority List Sites
- Landfill Sites
- Dept. Defense Sites

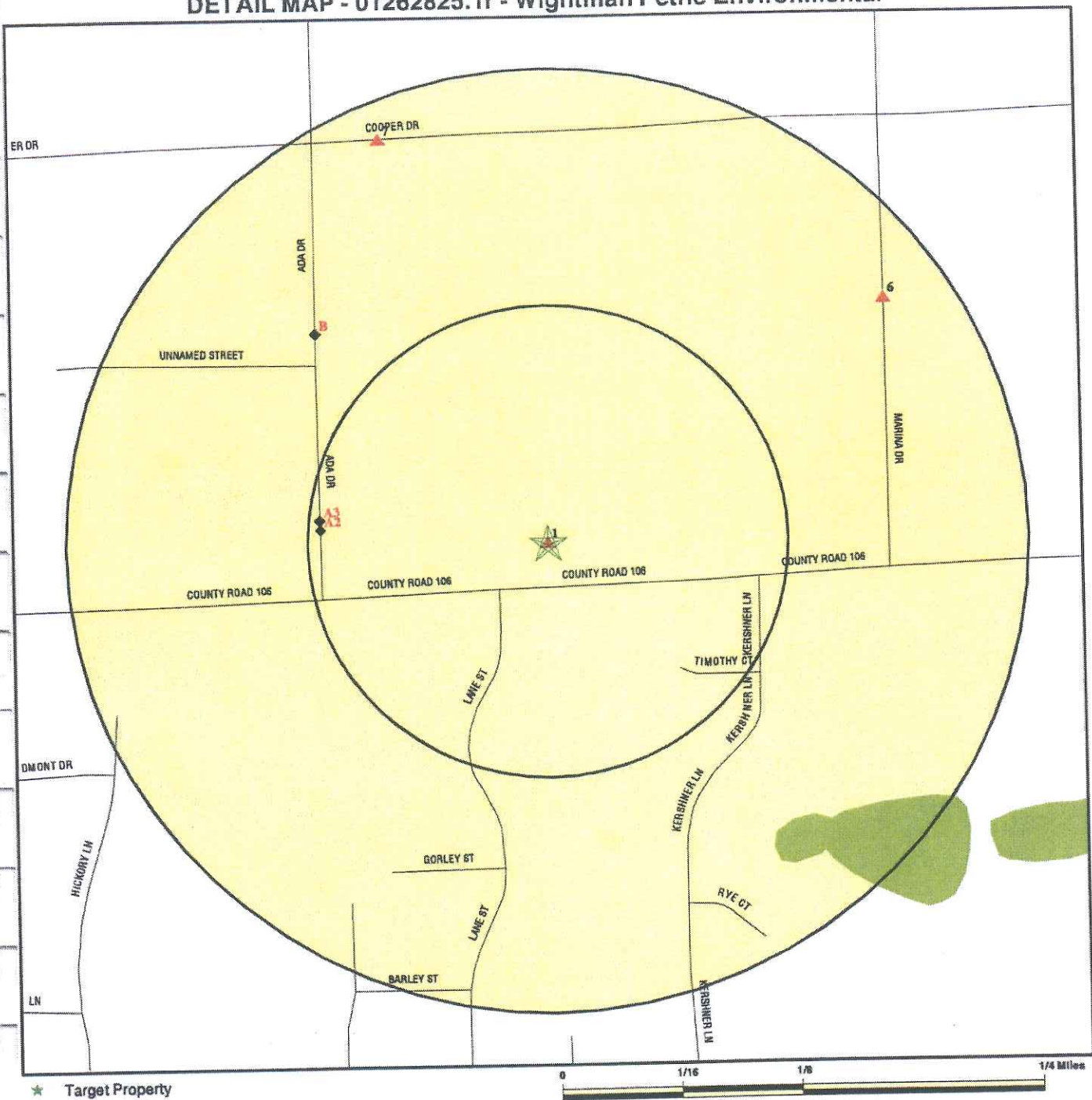
- Indian Reservations BIA
- Oil & Gas pipelines
- 100-year flood zone
- 500-year flood zone
- Federal Wetlands

0 1/4 1/2 1 Mile

TARGET PROPERTY: Environmental Test Systems Facility
ADDRESS: 23575 County Road 106
CITY/STATE/ZIP: Elkhart IN 46514
LAT/LONG: 41.7172 / 85.9205

CUSTOMER: Wightman Petrie Environmental
CONTACT: Conley Phifer
INQUIRY #: 01262825.1r
DATE: September 09, 2004 8:24 am

DETAIL MAP - 01262825.1r - Wightman Petrie Environmental



- ★ Target Property
- ▲ Sites at elevations higher than or equal to the target property
- ◆ Sites at elevations lower than the target property
- ▲ Coal Gasification Sites
- ⚡ Sensitive Receptors
- ☒ National Priority List Sites
- ☒ Landfill Sites
- ☒ Dept. Defense Sites

- ☐ Indian Reservations BIA
- ⚡ Oil & Gas pipelines
- ▨ 100-year flood zone
- ▨ 500-year flood zone
- ▨ Federal Wetlands

TARGET PROPERTY: Environmental Test Systems Facility
 ADDRESS: 23575 County Road 106
 CITY/STATE/ZIP: Elkhart IN 46514
 LAT/LONG: 41.7172 / 85.9205

CUSTOMER: Wightman Petrie Environmental
 CONTACT: Conley Phifer
 INQUIRY #: 01262825.1r
 DATE: September 09, 2004 8:24 am

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MAP FINDINGS SUMMARY

Database	Target Property	Search Distance (Miles)	< 1/8	1/8 - 1/4	1/4 - 1/2	1/2 - 1	> 1	Total Plotted
<u>FEDERAL ASTM STANDARD</u>								
NPL		1.000	0	0	0	0	NR	0
Proposed NPL		1.000	0	0	0	0	NR	0
CERCLIS		0.500	0	0	0	NR	NR	0
CERC-NFRAP		0.250	0	0	NR	NR	NR	0
CORRACTS		1.000	0	0	0	0	NR	0
RCRIS-TSD		0.500	0	0	0	NR	NR	0
RCRIS Lg. Quan. Gen.		0.250	0	1	NR	NR	NR	1
RCRIS Sm. Quan. Gen.	X	0.250	2	2	NR	NR	NR	4
ERNS		TP	NR	NR	NR	NR	NR	0
<u>STATE ASTM STANDARD</u>								
State Haz. Waste		1.000	0	0	0	0	NR	0
State Landfill		0.500	0	0	0	NR	NR	0
LUST		0.500	0	0	0	NR	NR	0
UST		0.250	0	1	NR	NR	NR	1
VCP		0.500	0	0	0	NR	NR	0
<u>FEDERAL ASTM SUPPLEMENTAL</u>								
CONSENT		1.000	0	0	0	0	NR	0
ROD		1.000	0	0	0	0	NR	0
Delisted NPL		1.000	0	0	0	0	NR	0
FINDS	X	TP	NR	NR	NR	NR	NR	0
HMIRS		TP	NR	NR	NR	NR	NR	0
MLTS		TP	NR	NR	NR	NR	NR	0
MINES		0.250	0	0	NR	NR	NR	0
NPL Liens		TP	NR	NR	NR	NR	NR	0
PADS		TP	NR	NR	NR	NR	NR	0
DOD		1.000	0	0	0	0	NR	0
US BROWNFIELDS		0.500	0	0	0	NR	NR	0
UMTRA		0.500	0	0	0	NR	NR	0
FUDS		1.000	0	0	0	0	NR	0
INDIAN RESERV		1.000	0	0	0	0	NR	0
RAATS		TP	NR	NR	NR	NR	NR	0
TRIS		TP	NR	NR	NR	NR	NR	0
TSCA		TP	NR	NR	NR	NR	NR	0
SSTS		TP	NR	NR	NR	NR	NR	0
FTTS		TP	NR	NR	NR	NR	NR	0
<u>STATE OR LOCAL ASTM SUPPLEMENTAL</u>								
IN Spills		TP	NR	NR	NR	NR	NR	0
BULK		TP	NR	NR	NR	NR	NR	0
<u>EDR PROPRIETARY HISTORICAL DATABASES</u>								
Coal Gas		1.000	0	0	0	0	NR	0

MAP FINDINGS SUMMARY

<u>Database</u>	<u>Target Property</u>	<u>Search Distance (Miles)</u>	<u>< 1/8</u>	<u>1/8 - 1/4</u>	<u>1/4 - 1/2</u>	<u>1/2 - 1</u>	<u>> 1</u>	<u>Total Plotted</u>
<u>BROWNFIELDS DATABASES</u>								
US BROWNFIELDS		0.500	0	0	0	NR	NR	0
Brownfields		0.500	0	0	0	NR	NR	0
AUL		0.500	0	0	0	NR	NR	0
VCP		0.500	0	0	0	NR	NR	0

NOTES:

TP = Target Property

NR = Not Requested at this Search Distance

Sites may be listed in more than one database

Map ID
Direction
Distance
Distance (ft.)
Elevation

MAP FINDINGS

Database(s) EDR ID Number
EPA ID Number

Coal Gas Site Search: No site was found in a search of Real Property Scan's ENVIROHAZ database.

1 ENVIRONMENTAL TEST SYSTEMS INC RCRIS-SQG 1000261549
Target 23575 CR 106 FINDS IND152094785
Property ELKHART, IN 46514

Actual: 768 ft.
RCRIS:
Owner: DANAHER CORP
(574) 262-2060
EPA ID: IND152094785
Contact: TRISSA WHITESELL
(574) 262-2060
Classification: Conditionally Exempt Small Quantity Generator
TSDF Activities: Not reported
Violation Status: No violations found

FINDS:
Other Pertinent Environmental Activity Identified at Site:
Aerometric Information Retrieval System/AIRS Facility Subsystem
National Emissions Inventory
National Emissions Trends
National Toxics Inventory
Resource Conservation and Recovery Act Information system

A2 VOYAGER DAKAT INC RCRIS-SQG 1000146126
West 53468 ADA DR FINDS IND982615403
< 1/8 ELKHART, IN 46514
626 ft.

Site 1 of 2 in cluster A

Relative: Lower
RCRIS:
Owner: STEVE BENNETT
(574) 264-9504
Actual: 767 ft. EPA ID: IND982615403
Contact: Not reported
Classification: Conditionally Exempt Small Quantity Generator
TSDF Activities: Not reported
Violation Status: No violations found

FINDS:
Other Pertinent Environmental Activity Identified at Site:
Indiana Facility Registry System
Resource Conservation and Recovery Act Information system

A3 KELLMARK CORP RCRIS-SQG 1007092968
West 53465 ADA DR IN0000632240
< 1/8 ELKHART, IN 46514
630 ft.

Site 2 of 2 in cluster A

Relative: Lower

Actual: 767 ft.

Map ID
Direction
Distance
Distance (ft.)
Elevation

MAP FINDINGS

Site Database(s) EDR ID Number
EPA ID Number

KELLMARK CORP (Continued)

1007092968

RCRIS:

Owner: KELLMARK CORP
(574) 264-9695
EPA ID: IN0000632240
Contact: JAMES KELLY
(574) 264-9695

Classification: Conditionally Exempt Small Quantity Generator
TSDF Activities: Not reported

Violation Status: No violations found

B4
NW
1/8-1/4
862 ft.

CHUPP & SONS CONVERSIONS
53387 ADA DR
ELKHART, IN 46514

UST 1000753624
N/A

Site 1 of 2 in cluster B

Relative:
Lower

UST:

Actual:
767 ft.

Facility ID: 3318
Tank Number: 1
Tank Status: PERMANENTLY OUT OF SERVICE
Install Date: / /
Closure Date: 2/15/1998 0:00
Owner Id: 1388
Company Name: Chupp & Sons Conversions Inc
Mailing Address: 53387 Ada Dr
Elkhart, IN 46514

B5
NW
1/8-1/4
862 ft.

SHERRY DESIGNS
53387 ADA DR
ELKHART, IN 46514

RCRIS-SQG 1000160679
FINDS IND982607947

Site 2 of 2 in cluster B

Relative:
Lower

RCRIS:

Actual:
767 ft.

Owner: LANDS FRED
(312) 555-1212
EPA ID: IND982607947
Contact: KEN WAGNER
(219) 262-1511

Classification: Small Quantity Generator
TSDF Activities: Not reported

Violation Status: No violations found

FINDS:

Other Pertinent Environmental Activity Identified at Site:
Aerometric Information Retrieval System/AIRS Facility Subsystem
Indiana Facility Registry System
National Emissions Inventory
National Toxics Inventory
Resource Conservation and Recovery Act Information system

Map ID
Direction
Distance
Distance (ft.)
Elevation

MAP FINDINGS

6
NE
1/8-1/4
1147 ft.

KEYLINE SALES INC
53364 MARINA DR
ELKHART, IN 46515

Database(s) EDR ID Number
EPA ID Number

RCRIS-SQG 1000109029
FINDS IND074301268

Relative:
Equal

RCRIS:
Owner: LOWENHAR JUDD
(312) 555-1212

Actual:
768 ft.

EPA ID: IND074301268
Contact: JUDD LOWENHAR
(219) 262-4571

Classification: Small Quantity Generator
TSDF Activities: Not reported

Violation Status: No violations found

FINDS:

Other Pertinent Environmental Activity Identified at Site:
Indiana Facility Registry System
Resource Conservation and Recovery Act Information system

7
NNW
1/8-1/4
1215 ft.

ASHLAND CHEMICAL INC
23740 COOPER DR.
ELKHART, IN 46514

FINDS 1000213150
RCRIS-LQG IND984866871

Relative:
Higher

RCRIS:
Owner: NAME NOT REPORTED
(312) 555-1212

Actual:
770 ft.

EPA ID: IND984866871
Contact: Not reported
Classification: Large Quantity Generator
TSDF Activities: Not reported

BIENNIAL REPORTS:

Last Biennial Reporting Year: 2001

Waste	Quantity (Lbs)
D001	21250.00

Violation Status: Violations exist

Regulation Violated:	Not reported
Area of Violation:	GENERATOR-MANIFEST REQUIREMENTS
Date Violation Determined:	11/17/1995
Actual Date Achieved Compliance:	01/26/1996

Enforcement Action:	WRITTEN INFORMAL
Enforcement Action Date:	12/08/1995
Penalty Type:	Not reported

Regulation Violated:	Not reported
Area of Violation:	GENERATOR-RECORDKEEPING REQUIREMENTS
Date Violation Determined:	11/17/1995
Actual Date Achieved Compliance:	01/26/1996

Enforcement Action:	WRITTEN INFORMAL
Enforcement Action Date:	12/08/1995
Penalty Type:	Not reported

Regulation Violated:	Not reported
Area of Violation:	TSD-LAND BAN REQUIREMENTS
Date Violation Determined:	11/17/1995

Map ID
Direction
Distance
Distance (ft.)
Elevation Site

MAP FINDINGS

Database(s) EDR ID Number
EPA ID Number

ASHLAND CHEMICAL INC (Continued)

1000213150

Actual Date Achieved Compliance: 01/26/1996
Enforcement Action: WRITTEN INFORMAL
Enforcement Action Date: 12/08/1995
Penalty Type: Not reported
Regulation Violated: Not reported
Area of Violation: TSD-OTHER REQUIREMENTS
Date Violation Determined: 11/17/1995
Actual Date Achieved Compliance: 01/26/1996
Enforcement Action: WRITTEN INFORMAL
Enforcement Action Date: 12/08/1995
Penalty Type: Not reported
Regulation Violated: Not reported
Area of Violation: TSD-PREPAREDNESS/PREVENTION REQUIREMENTS
Date Violation Determined: 11/17/1995
Actual Date Achieved Compliance: 01/26/1996
Enforcement Action: WRITTEN INFORMAL
Enforcement Action Date: 12/08/1995
Penalty Type: Not reported
Regulation Violated: Not reported
Area of Violation: GENERATOR-PRE-TRANSPORT REQUIREMENTS
Date Violation Determined: 11/17/1995
Actual Date Achieved Compliance: 01/26/1996
Enforcement Action: WRITTEN INFORMAL
Enforcement Action Date: 12/08/1995
Penalty Type: Not reported

There are 6 violation record(s) reported at this site:

<u>Evaluation</u>	<u>Area of Violation</u>	<u>Date of Compliance</u>
Compliance Schedule Evaluation	GENERATOR-MANIFEST REQUIREMENTS	19960126
	GENERATOR-RECORDKEEPING REQUIREMENTS	19960126
	TSD-LAND BAN REQUIREMENTS	19960126
	TSD-OTHER REQUIREMENTS	19960126
	TSD-PREPAREDNESS/PREVENTION REQUIREMENTS	19960126
Compliance Evaluation Inspection	GENERATOR-PRE-TRANSPORT REQUIREMENTS	19960126
	GENERATOR-MANIFEST REQUIREMENTS	19960126
	GENERATOR-RECORDKEEPING REQUIREMENTS	19960126
	TSD-LAND BAN REQUIREMENTS	19960126
	TSD-OTHER REQUIREMENTS	19960126
	TSD-PREPAREDNESS/PREVENTION REQUIREMENTS	19960126
	GENERATOR-PRE-TRANSPORT REQUIREMENTS	19960126

FINDS:

Other Pertinent Environmental Activity Identified at Site:
Indiana Facility Registry System
National Emissions Inventory
Resource Conservation and Recovery Act Information system
Toxics Release Inventory

ORPHAN SUMMARY

City	EDR ID	Site Name	Site Address	Zip	Database(s)
ELKHART	U000185035	HUDSON BUILDING SUPPLY	30244 CR 12		IN Spills, UST
ELKHART	S105678277	LUSHER AVENUE	CR18 AND 21ST STREET	46514	SHWS
ELKHART	1003870725	CIRCLE R	CIRCLE R LANE	46514	CERC-NFRAP
ELKHART	1003870653	ELKHART SLUDGE FARM	COUNTY ROAD 3	46514	CERC-NFRAP
INDIANAPOLIS	1000515602	FIRESTONE #10NC	1300 E 86TH ST	46514	IN Spills, UST

EPA Waste Codes Addendum

Code	Description
D001	IGNITABLE HAZARDOUS WASTES ARE THOSE WASTES WHICH HAVE A FLASHPOINT OF LESS THAN 140 DEGREES FAHRENHEIT AS DETERMINED BY A PENSKEY-MARTENS CLOSED CUP FLASH POINT TESTER. ANOTHER METHOD OF DETERMINING THE FLASH POINT OF A WASTE IS TO REVIEW THE MATERIAL SAFETY DATA SHEET, WHICH CAN BE OBTAINED FROM THE MANUFACTURER OR DISTRIBUTOR OF THE MATERIAL. LACQUER THINNER IS AN EXAMPLE OF A COMMONLY USED SOLVENT WHICH WOULD BE CONSIDERED AS IGNITABLE HAZARDOUS WASTE.

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

To maintain currency of the following federal and state databases, EDR contacts the appropriate governmental agency on a monthly or quarterly basis, as required.

Elapsed ASTM days: Provides confirmation that this EDR report meets or exceeds the 90-day updating requirement of the ASTM standard.

FEDERAL ASTM STANDARD RECORDS

NPL: National Priority List

Source: EPA

Telephone: N/A

National Priorities List (Superfund). The NPL is a subset of CERCLIS and identifies over 1,200 sites for priority cleanup under the Superfund Program. NPL sites may encompass relatively large areas. As such, EDR provides polygon coverage for over 1,000 NPL site boundaries produced by EPA's Environmental Photographic Interpretation Center (EPIC) and regional EPA offices.

Date of Government Version: 04/27/04

Date Made Active at EDR: 05/21/04

Database Release Frequency: Semi-Annually

Date of Data Arrival at EDR: 05/04/04

Elapsed ASTM days: 17

Date of Last EDR Contact: 08/03/04

NPL Site Boundaries

Sources:

EPA's Environmental Photographic Interpretation Center (EPIC)

Telephone: 202-564-7333

EPA Region 1

Telephone 617-918-1143

EPA Region 3

Telephone 215-814-5418

EPA Region 4

Telephone 404-562-8033

EPA Region 6

Telephone: 214-655-6659

EPA Region 8

Telephone: 303-312-6774

Proposed NPL: Proposed National Priority List Sites

Source: EPA

Telephone: N/A

Date of Government Version: 04/27/04

Date Made Active at EDR: 05/21/04

Database Release Frequency: Semi-Annually

Date of Data Arrival at EDR: 05/04/04

Elapsed ASTM days: 17

Date of Last EDR Contact: 08/03/04

CERCLIS: Comprehensive Environmental Response, Compensation, and Liability Information System

Source: EPA

Telephone: 703-413-0223

CERCLIS contains data on potentially hazardous waste sites that have been reported to the USEPA by states, municipalities, private companies and private persons, pursuant to Section 103 of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). CERCLIS contains sites which are either proposed to or on the National Priorities List (NPL) and sites which are in the screening and assessment phase for possible inclusion on the NPL.

Date of Government Version: 05/17/04

Date Made Active at EDR: 08/10/04

Database Release Frequency: Quarterly

Date of Data Arrival at EDR: 06/23/04

Elapsed ASTM days: 48

Date of Last EDR Contact: 06/23/04

CERCLIS-NFRAP: CERCLIS No Further Remedial Action Planned

Source: EPA

Telephone: 703-413-0223

As of February 1995, CERCLIS sites designated "No Further Remedial Action Planned" (NFRAP) have been removed from CERCLIS. NFRAP sites may be sites where, following an initial investigation, no contamination was found, contamination was removed quickly without the need for the site to be placed on the NPL, or the contamination was not serious enough to require Federal Superfund action or NPL consideration. EPA has removed approximately 25,000 NFRAP sites to lift the unintended barriers to the redevelopment of these properties and has archived them as historical records so EPA does not needlessly repeat the investigations in the future. This policy change is part of the EPA's Brownfields Redevelopment Program to help cities, states, private investors and affected citizens to promote economic redevelopment of unproductive urban sites.

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

Date of Government Version: 05/17/04
Date Made Active at EDR: 08/10/04
Database Release Frequency: Quarterly

Date of Data Arrival at EDR: 06/23/04
Elapsed ASTM days: 48
Date of Last EDR Contact: 06/23/04

CORRACTS: Corrective Action Report

Source: EPA
Telephone: 800-424-9346
CORRACTS identifies hazardous waste handlers with RCRA corrective action activity.

Date of Government Version: 06/15/04
Date Made Active at EDR: 08/10/04
Database Release Frequency: Semi-Annually

Date of Data Arrival at EDR: 06/25/04
Elapsed ASTM days: 46
Date of Last EDR Contact: 06/07/04

RCRIS: Resource Conservation and Recovery Information System

Source: EPA
Telephone: 800-424-9346
Resource Conservation and Recovery Information System. RCRIS includes selective information on sites which generate, transport, store, treat and/or dispose of hazardous waste as defined by the Resource Conservation and Recovery Act (RCRA). Conditionally exempt small quantity generators (CESQGs): generate less than 100 kg of hazardous waste, or less than 1 kg of acutely hazardous waste per month. Small quantity generators (SQGs): generate between 100 kg and 1,000 kg of hazardous waste per month. Large quantity generators (LQGs): generate over 1,000 kilograms (kg) of hazardous waste, or over 1 kg of acutely hazardous waste per month. Transporters are individuals or entities that move hazardous waste from the generator off-site to a facility that can recycle, treat, store, or dispose of the waste. TSDFs treat, store, or dispose of the waste.

Date of Government Version: 06/15/04
Date Made Active at EDR: 07/20/04
Database Release Frequency: Varies

Date of Data Arrival at EDR: 06/23/04
Elapsed ASTM days: 27
Date of Last EDR Contact: 08/24/04

ERNS: Emergency Response Notification System

Source: National Response Center, United States Coast Guard
Telephone: 202-260-2342
Emergency Response Notification System. ERNS records and stores information on reported releases of oil and hazardous substances.

Date of Government Version: 12/31/03
Date Made Active at EDR: 03/12/04
Database Release Frequency: Annually

Date of Data Arrival at EDR: 01/26/04
Elapsed ASTM days: 46
Date of Last EDR Contact: 07/26/04

FEDERAL ASTM SUPPLEMENTAL RECORDS

BRS: Biennial Reporting System

Source: EPA/NTIS
Telephone: 800-424-9346
The Biennial Reporting System is a national system administered by the EPA that collects data on the generation and management of hazardous waste. BRS captures detailed data from two groups: Large Quantity Generators (LQG) and Treatment, Storage, and Disposal Facilities.

Date of Government Version: 12/01/01
Database Release Frequency: Biennially

Date of Last EDR Contact: 06/22/04
Date of Next Scheduled EDR Contact: 09/13/04

CONSENT: Superfund (CERCLA) Consent Decrees

Source: EPA Regional Offices
Telephone: Varies
Major legal settlements that establish responsibility and standards for cleanup at NPL (Superfund) sites. Released periodically by United States District Courts after settlement by parties to litigation matters.

Date of Government Version: N/A
Database Release Frequency: Varies

Date of Last EDR Contact: N/A
Date of Next Scheduled EDR Contact: N/A

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

ROD: Records Of Decision

Source: EPA

Telephone: 703-416-0223

Record of Decision. ROD documents mandate a permanent remedy at an NPL (Superfund) site containing technical and health information to aid in the cleanup.

Date of Government Version: 04/08/04

Database Release Frequency: Annually

Date of Last EDR Contact: 07/07/04

Date of Next Scheduled EDR Contact: 10/04/04

DELISTED NPL: National Priority List Deletions

Source: EPA

Telephone: N/A

The National Oil and Hazardous Substances Pollution Contingency Plan (NCP) establishes the criteria that the EPA uses to delete sites from the NPL. In accordance with 40 CFR 300.425.(e), sites may be deleted from the NPL where no further response is appropriate.

Date of Government Version: 04/27/04

Database Release Frequency: Quarterly

Date of Last EDR Contact: 08/03/04

Date of Next Scheduled EDR Contact: 11/01/04

FINDS: Facility Index System/Facility Identification Initiative Program Summary Report

Source: EPA

Telephone: N/A

Facility Index System. FINDS contains both facility information and 'pointers' to other sources that contain more detail. EDR includes the following FINDS databases in this report: PCS (Permit Compliance System), AIRS (Aerometric Information Retrieval System), DOCKET (Enforcement Docket used to manage and track information on civil judicial enforcement cases for all environmental statutes), FURS (Federal Underground Injection Control), C-DOCKET (Criminal Docket System used to track criminal enforcement actions for all environmental statutes), FFIS (Federal Facilities Information System), STATE (State Environmental Laws and Statutes), and PADS (PCB Activity Data System).

Date of Government Version: 04/08/04

Database Release Frequency: Quarterly

Date of Last EDR Contact: 07/06/04

Date of Next Scheduled EDR Contact: 10/04/04

HMIRS: Hazardous Materials Information Reporting System

Source: U.S. Department of Transportation

Telephone: 202-366-4555

Hazardous Materials Incident Report System. HMIRS contains hazardous material spill incidents reported to DOT.

Date of Government Version: 02/17/04

Database Release Frequency: Annually

Date of Last EDR Contact: 04/20/04

Date of Next Scheduled EDR Contact: 07/19/04

MLTS: Material Licensing Tracking System

Source: Nuclear Regulatory Commission

Telephone: 301-415-7169

MLTS is maintained by the Nuclear Regulatory Commission and contains a list of approximately 8,100 sites which possess or use radioactive materials and which are subject to NRC licensing requirements. To maintain currency, EDR contacts the Agency on a quarterly basis.

Date of Government Version: 04/19/04

Database Release Frequency: Quarterly

Date of Last EDR Contact: 07/06/04

Date of Next Scheduled EDR Contact: 10/04/04

MINES: Mines Master Index File

Source: Department of Labor, Mine Safety and Health Administration

Telephone: 303-231-5959

Date of Government Version: 03/05/04

Database Release Frequency: Semi-Annually

Date of Last EDR Contact: 06/30/04

Date of Next Scheduled EDR Contact: 09/27/04

NPL LIENS: Federal Superfund Liens

Source: EPA

Telephone: 202-564-4267

Federal Superfund Liens. Under the authority granted the USEPA by the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) of 1980, the USEPA has the authority to file liens against real property in order to recover remedial action expenditures or when the property owner receives notification of potential liability. USEPA compiles a listing of filed notices of Superfund Liens.

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

Date of Government Version: 10/15/91
Database Release Frequency: No Update Planned

Date of Last EDR Contact: 08/23/04
Date of Next Scheduled EDR Contact: 11/22/04

PADS: PCB Activity Database System

Source: EPA
Telephone: 202-564-3887

PCB Activity Database. PADS Identifies generators, transporters, commercial storers and/or brokers and disposers of PCB's who are required to notify the EPA of such activities.

Date of Government Version: 03/30/04
Database Release Frequency: Annually

Date of Last EDR Contact: 08/10/04
Date of Next Scheduled EDR Contact: 11/08/04

DOD: Department of Defense Sites

Source: USGS
Telephone: 703-692-8801

This data set consists of federally owned or administered lands, administered by the Department of Defense, that have any area equal to or greater than 640 acres of the United States, Puerto Rico, and the U.S. Virgin Islands.

Date of Government Version: 10/01/03
Database Release Frequency: Semi-Annually

Date of Last EDR Contact: 08/12/04
Date of Next Scheduled EDR Contact: 11/08/04

STORMWATER: Storm Water General Permits

Source: Environmental Protection Agency
Telephone: 202 564-0746

A listing of all facilities with Storm Water General Permits.

Date of Government Version: N/A
Database Release Frequency: Quarterly

Date of Last EDR Contact: N/A
Date of Next Scheduled EDR Contact: N/A

INDIAN RESERV: Indian Reservations

Source: USGS
Telephone: 202-208-3710

This map layer portrays Indian administered lands of the United States that have any area equal to or greater than 640 acres.

Date of Government Version: 10/01/03
Database Release Frequency: Semi-Annually

Date of Last EDR Contact: 08/12/04
Date of Next Scheduled EDR Contact: 11/08/04

US BROWNFIELDS: A Listing of Brownfields Sites

Source: Environmental Protection Agency
Telephone: 202-566-2777

Included in the listing are brownfields properties addresses by Cooperative Agreement Recipients and brownfields properties addressed by Targeted Brownfields Assessments. Targeted Brownfields Assessments-EPA's Targeted Brownfields Assessments (TBA) program is designed to help states, tribes, and municipalities--especially those without EPA Brownfields Assessment Demonstration Pilots--minimize the uncertainties of contamination often associated with brownfields. Under the TBA program, EPA provides funding and/or technical assistance for environmental assessments at brownfields sites throughout the country. Targeted Brownfields Assessments supplement and work with other efforts under EPA's Brownfields Initiative to promote cleanup and redevelopment of brownfields. Cooperative Agreement Recipients-States, political subdivisions, territories, and Indian tribes become BCRLF cooperative agreement recipients when they enter into BCRLF cooperative agreements with the U.S. EPA. EPA selects BCRLF cooperative agreement recipients based on a proposal and application process. BCRLF cooperative agreement recipients must use EPA funds provided through BCRLF cooperative agreement for specified brownfields-related cleanup activities.

Date of Government Version: 04/14/04
Database Release Frequency: Semi-Annually

Date of Last EDR Contact: 06/14/04
Date of Next Scheduled EDR Contact: 09/13/04

RMP: Risk Management Plans

Source: Environmental Protection Agency
Telephone: 202-564-8600

When Congress passed the Clean Air Act Amendments of 1990, it required EPA to publish regulations and guidance for chemical accident prevention at facilities using extremely hazardous substances. The Risk Management Program Rule (RMP Rule) was written to implement Section 112(r) of these amendments. The rule, which built upon existing industry codes and standards, requires companies of all sizes that use certain flammable and toxic substances to develop a Risk Management Program, which includes a(n): Hazard assessment that details the potential effects of an accidental release, an accident history of the last five years, and an evaluation of worst-case and alternative accidental releases; Prevention program that includes safety precautions and maintenance, monitoring, and employee training measures; and Emergency response program that spells out emergency health care, employee training measures and procedures for informing the public and response agencies (e.g the fire department) should an accident occur.

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

Date of Government Version: N/A
Database Release Frequency: N/A

Date of Last EDR Contact: N/A
Date of Next Scheduled EDR Contact: N/A

FUDS: Formerly Used Defense Sites

Source: U.S. Army Corps of Engineers
Telephone: 202-528-4285

The listing includes locations of Formerly Used Defense Sites properties where the US Army Corps of Engineers is actively working or will take necessary cleanup actions.

Date of Government Version: 10/01/03
Database Release Frequency: Varies

Date of Last EDR Contact: 07/06/04
Date of Next Scheduled EDR Contact: 10/04/04

UMTRA: Uranium Mill Tailings Sites

Source: Department of Energy
Telephone: 505-845-0011

Uranium ore was mined by private companies for federal government use in national defense programs. When the mills shut down, large piles of the sand-like material (mill tailings) remain after uranium has been extracted from the ore. Levels of human exposure to radioactive materials from the piles are low; however, in some cases tailings were used as construction materials before the potential health hazards of the tailings were recognized. In 1978, 24 inactive uranium mill tailings sites in Oregon, Idaho, Wyoming, Utah, Colorado, New Mexico, Texas, North Dakota, South Dakota, Pennsylvania, and on Navajo and Hopi tribal lands, were targeted for cleanup by the Department of Energy.

Date of Government Version: 04/22/04
Database Release Frequency: Varies

Date of Last EDR Contact: 06/21/04
Date of Next Scheduled EDR Contact: 09/20/04

RAATS: RCRA Administrative Action Tracking System

Source: EPA
Telephone: 202-564-4104

RCRA Administration Action Tracking System. RAATS contains records based on enforcement actions issued under RCRA pertaining to major violators and includes administrative and civil actions brought by the EPA. For administration actions after September 30, 1995, data entry in the RAATS database was discontinued. EPA will retain a copy of the database for historical records. It was necessary to terminate RAATS because a decrease in agency resources made it impossible to continue to update the information contained in the database.

Date of Government Version: 04/17/95
Database Release Frequency: No Update Planned

Date of Last EDR Contact: 06/07/04
Date of Next Scheduled EDR Contact: 09/06/04

TRIS: Toxic Chemical Release Inventory System

Source: EPA
Telephone: 202-566-0250

Toxic Release Inventory System. TRIS identifies facilities which release toxic chemicals to the air, water and land in reportable quantities under SARA Title III Section 313.

Date of Government Version: 12/31/01
Database Release Frequency: Annually

Date of Last EDR Contact: 06/22/04
Date of Next Scheduled EDR Contact: 09/20/04

TSCA: Toxic Substances Control Act

Source: EPA
Telephone: 202-260-5521

Toxic Substances Control Act. TSCA identifies manufacturers and importers of chemical substances included on the TSCA Chemical Substance Inventory list. It includes data on the production volume of these substances by plant site.

Date of Government Version: 12/31/02
Database Release Frequency: Every 4 Years

Date of Last EDR Contact: 06/07/04
Date of Next Scheduled EDR Contact: 09/06/04

FTTS INSP: FIFRA/ TSCA Tracking System - FIFRA (Federal Insecticide, Fungicide, & Rodenticide Act)/TSCA (Toxic Substances Control Act)

Source: EPA
Telephone: 202-564-2501

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

Date of Government Version: 04/13/04
Database Release Frequency: Quarterly

Date of Last EDR Contact: 06/21/04
Date of Next Scheduled EDR Contact: 09/20/04

SSTS: Section 7 Tracking Systems

Source: EPA
Telephone: 202-564-5008

Section 7 of the Federal Insecticide, Fungicide and Rodenticide Act, as amended (92 Stat. 829) requires all registered pesticide-producing establishments to submit a report to the Environmental Protection Agency by March 1st each year. Each establishment must report the types and amounts of pesticides, active ingredients and devices being produced, and those having been produced and sold or distributed in the past year.

Date of Government Version: 12/31/01
Database Release Frequency: Annually

Date of Last EDR Contact: 07/20/04
Date of Next Scheduled EDR Contact: 10/18/04

FTTS: FIFRA/ TSCA Tracking System - FIFRA (Federal Insecticide, Fungicide, & Rodenticide Act)/TSCA (Toxic Substances Control Act)

Source: EPA/Office of Prevention, Pesticides and Toxic Substances
Telephone: 202-564-2501

FTTS tracks administrative cases and pesticide enforcement actions and compliance activities related to FIFRA, TSCA and EPCRA (Emergency Planning and Community Right-to-Know Act). To maintain currency, EDR contacts the Agency on a quarterly basis.

Date of Government Version: 04/13/04
Database Release Frequency: Quarterly

Date of Last EDR Contact: 06/21/04
Date of Next Scheduled EDR Contact: 09/20/04

STATE OF INDIANA ASTM STANDARD RECORDS

SHWS: List of Hazardous Waste Response Sites Scored Using the Indiana Scoring Model

Source: Department of Environmental Management
Telephone: 317-308-3052

State Hazardous Waste Sites. State hazardous waste site records are the states' equivalent to CERCLIS. These sites may or may not already be listed on the federal CERCLIS list. Priority sites planned for cleanup using state funds (state equivalent of Superfund) are identified along with sites where cleanup will be paid for by potentially responsible parties. Available information varies by state.

Date of Government Version: 03/01/04
Date Made Active at EDR: 04/21/04
Database Release Frequency: Annually

Date of Data Arrival at EDR: 03/31/04
Elapsed ASTM days: 21
Date of Last EDR Contact: 07/02/04

SWF/LF: Permitted Solid Waste Facilities

Source: Department of Environmental Management
Telephone: 317-232-0066

Solid Waste Facilities/Landfill Sites. SWF/LF type records typically contain an inventory of solid waste disposal facilities or landfills in a particular state. Depending on the state, these may be active or inactive facilities or open dumps that failed to meet RCRA Subtitle D Section 4004 criteria for solid waste landfills or disposal sites.

Date of Government Version: 06/01/04
Date Made Active at EDR: 09/08/04
Database Release Frequency: Semi-Annually

Date of Data Arrival at EDR: 07/13/04
Elapsed ASTM days: 57
Date of Last EDR Contact: 07/13/04

LUST: Lust Leaking Underground Storage Tank List

Source: Department of Environmental Management
Telephone: 317-308-3008

Leaking Underground Storage Tank Incident Reports. LUST records contain an inventory of reported leaking underground storage tank incidents. Not all states maintain these records, and the information stored varies by state.

Date of Government Version: 06/02/04
Date Made Active at EDR: 08/06/04
Database Release Frequency: Annually

Date of Data Arrival at EDR: 06/30/04
Elapsed ASTM days: 37
Date of Last EDR Contact: 06/30/04

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

UST: Indiana Registered Underground Storage Tanks

Source: Department of Environmental Management
Telephone: 317-308-3008

Registered Underground Storage Tanks. UST's are regulated under Subtitle I of the Resource Conservation and Recovery Act (RCRA) and must be registered with the state department responsible for administering the UST program. Available information varies by state program.

Date of Government Version: 06/02/04
Date Made Active at EDR: 07/29/04
Database Release Frequency: Quarterly

Date of Data Arrival at EDR: 06/30/04
Elapsed ASTM days: 29
Date of Last EDR Contact: 06/30/04

VCP: Voluntary Remediation Program Site List

Source: Department of Environmental Management
Telephone: 317-234-0966

A current list of Voluntary Remediation Program sites that are no longer confidential.

Date of Government Version: 03/31/04
Date Made Active at EDR: 06/02/04
Database Release Frequency: Semi-Annually

Date of Data Arrival at EDR: 05/11/04
Elapsed ASTM days: 22
Date of Last EDR Contact: 08/09/04

STATE OF INDIANA ASTM SUPPLEMENTAL RECORDS

SPILLS: Spills Incidents

Source: Department of Environmental Management
Telephone: 317-308-3008

Date of Government Version: 06/02/04
Database Release Frequency: Semi-Annually

Date of Last EDR Contact: 06/30/04
Date of Next Scheduled EDR Contact: 09/27/04

BULK: Registered Bulk Fertilizer and Pesticide Storage Facilities

Source: Office of Indiana State Chemist
Telephone: 765-494-0579

A listing of registered dry or liquid bulk fertilizer and pesticide storage facilities.

Date of Government Version: 06/14/04
Database Release Frequency: Varies

Date of Last EDR Contact: 05/12/04
Date of Next Scheduled EDR Contact: 09/13/04

EDR PROPRIETARY HISTORICAL DATABASES

Former Manufactured Gas (Coal Gas) Sites: The existence and location of Coal Gas sites is provided exclusively to EDR by Real Property Scan, Inc. ©Copyright 1993 Real Property Scan, Inc. For a technical description of the types of hazards which may be found at such sites, contact your EDR customer service representative.

Disclaimer Provided by Real Property Scan, Inc.

The information contained in this report has predominantly been obtained from publicly available sources produced by entities other than Real Property Scan. While reasonable steps have been taken to insure the accuracy of this report, Real Property Scan does not guarantee the accuracy of this report. Any liability on the part of Real Property Scan is strictly limited to a refund of the amount paid. No claim is made for the actual existence of toxins at any site. This report does not constitute a legal opinion.

BROWNFIELDS DATABASES

Brownfields: Brownfields Site List

Source: Department of Environmental Management
Telephone: 317-233-2570

A brownfield site is an industrial or commercial property that is abandoned, inactive, or underutilized, on which expansion or redevelopment is complicated due to the actual or perceived environmental contamination.

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

Date of Government Version: 06/28/04
Database Release Frequency: Semi-Annually

Date of Last EDR Contact: 06/28/04
Date of Next Scheduled EDR Contact: 09/27/04

VCP: Voluntary Remediation Program Site List
Source: Department of Environmental Management
Telephone: 317-234-0966

A current list of Voluntary Remediation Program sites that are no longer confidential.

Date of Government Version: 03/31/04
Database Release Frequency: Semi-Annually

Date of Last EDR Contact: 08/09/04
Date of Next Scheduled EDR Contact: 11/08/04

AUL: Sites with Restrictions
Source: Department of Environmental Management
Telephone: 317-232-8603

Activity and use limitations include both engineering controls and institutional controls. A listing of Comfort/Site Status Letter sites that have been issued with controls.

Date of Government Version: 06/28/04
Database Release Frequency: Varies

Date of Last EDR Contact: 06/28/04
Date of Next Scheduled EDR Contact: 09/27/04

US BROWNFIELDS: A Listing of Brownfields Sites
Source: Environmental Protection Agency
Telephone: 202-566-2777

Included in the listing are brownfields properties addresses by Cooperative Agreement Recipients and brownfields properties addressed by Targeted Brownfields Assessments. Targeted Brownfields Assessments-EPA's Targeted Brownfields Assessments (TBA) program is designed to help states, tribes, and municipalities--especially those without EPA Brownfields Assessment Demonstration Pilots--minimize the uncertainties of contamination often associated with brownfields. Under the TBA program, EPA provides funding and/or technical assistance for environmental assessments at brownfields sites throughout the country. Targeted Brownfields Assessments supplement and work with other efforts under EPA's Brownfields Initiative to promote cleanup and redevelopment of brownfields. Cooperative Agreement Recipients-States, political subdivisions, territories, and Indian tribes become BCRLF cooperative agreement recipients when they enter into BCRLF cooperative agreements with the U.S. EPA. EPA selects BCRLF cooperative agreement recipients based on a proposal and application process. BCRLF cooperative agreement recipients must use EPA funds provided through BCRLF cooperative agreement for specified brownfields-related cleanup activities.

Date of Government Version: N/A
Database Release Frequency: Semi-Annually

Date of Last EDR Contact: N/A
Date of Next Scheduled EDR Contact: N/A

OTHER DATABASE(S)

Depending on the geographic area covered by this report, the data provided in these specialty databases may or may not be complete. For example, the existence of wetlands information data in a specific report does not mean that all wetlands in the area covered by the report are included. Moreover, the absence of any reported wetlands information does not necessarily mean that wetlands do not exist in the area covered by the report.

Oil/Gas Pipelines: This data was obtained by EDR from the USGS in 1994. It is referred to by USGS as GeoData Digital Line Graphs from 1:100,000-Scale Maps. It was extracted from the transportation category including some oil, but primarily gas pipelines.

Electric Power Transmission Line Data

Source: PennWell Corporation
Telephone: (800) 823-6277

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Sensitive Receptors: There are individuals deemed sensitive receptors due to their fragile immune systems and special sensitivity to environmental discharges. These sensitive receptors typically include the elderly, the sick, and children. While the location of all sensitive receptors cannot be determined, EDR indicates those buildings and facilities - schools, daycares, hospitals, medical centers, and nursing homes - where individuals who are sensitive receptors are likely to be located.

AHA Hospitals:

Source: American Hospital Association, Inc.
Telephone: 312-280-5991

The database includes a listing of hospitals based on the American Hospital Association's annual survey of hospitals.

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

Medical Centers: Provider of Services Listing

Source: Centers for Medicare & Medicaid Services

Telephone: 410-786-3000

A listing of hospitals with Medicare provider number, produced by Centers of Medicare & Medicaid Services, a federal agency within the U.S. Department of Health and Human Services.

Nursing Homes

Source: National Institutes of Health

Telephone: 301-594-6248

Information on Medicare and Medicaid certified nursing homes in the United States.

Public Schools

Source: National Center for Education Statistics

Telephone: 202-502-7300

The National Center for Education Statistics' primary database on elementary and secondary public education in the United States. It is a comprehensive, annual, national statistical database of all public elementary and secondary schools and school districts, which contains data that are comparable across all states.

Private Schools

Source: National Center for Education Statistics

Telephone: 202-502-7300

The National Center for Education Statistics' primary database on private school locations in the United States.

Daycare Centers: child Care Listing

Source: Family & Social Services Administration

Telephone: 317-232-4740

Flood Zone Data: This data, available in select counties across the country, was obtained by EDR in 1999 from the Federal Emergency Management Agency (FEMA). Data depicts 100-year and 500-year flood zones as defined by FEMA.

NWI: National Wetlands Inventory. This data, available in select counties across the country, was obtained by EDR in 2002 from the U.S. Fish and Wildlife Service.

STREET AND ADDRESS INFORMATION

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APPENDIX D
PHASE I ENVIRONMENTAL SITE ASSESSMENT
(Blasland, Bouck & Lee for Danaher Corporation – August 1999)

*Phase I Environmental Site
Assessment*

*Environmental Test Systems, Inc.
Elkhart, Indiana*

Danaher Corporation
Washington, D.C.

August 1999



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Executive Summary

The Environmental Test Systems, Inc. (ETS) facility is located at 23575 County Road 106 within Northland Industrial Park, which is northeast of the City of Elkhart, in Osolo Township, Elkhart County, Indiana. The ETS facility manufactures paper test strips for various purposes, and also houses laboratories for product research and development and offices for administration and marketing. ETS was purchased by Hach Company in April 1998, however, operations at the facility have generally remained unchanged under the new ownership and ETS continues to operate as a wholly-owned subsidiary of Hach Company.

Located along the western side of the property and immediately north of County Road 106 are three attached buildings (Buildings #1, #2, and #3). Building #1 is the original building constructed in 1985, and Buildings #2 and #3 were added in 1989 and 1994, respectively. Together the metal buildings with a concrete slab on grade foundations total approximately 40,000 square feet on an approximately 4.4-acre property. Paved parking areas are located north and east of the three buildings and comprise most of the remaining property. The northernmost portion of the property is an open lawn area. A drainage swale conveys surface-water runoff eastward along the northern property boundary and then southward along a portion of the eastern property boundary. The ETS property is bounded to the north, east, and west by other manufacturing facilities, and to the south by County Road 106. Residential properties are located directly south of County Road 106.

The ETS property and surrounding area is relatively flat, sloping gently southwest toward the St. Joseph River, which is approximately 1.3 miles south of the site. Surface elevations on the property range from approximately 770 to 775 feet above mean sea level based on published sources. Overburden in this area consists primarily of sand and gravel, and is underlain by bedrock at a depth of 50 to 150 feet below grade. The water table is located approximately 5 to 10 feet below grade, and based on the topography, shallow groundwater flow is expected to be southwest toward the St. Joseph River. A two-inch well was observed on the ETS property immediately east of Building #1, and is used for the building's fire sprinkler system.

The paper test strips manufactured at the facility are chemically treated for testing chemical presence and/or quantities for several applications, with the majority of products used by the pool and spa industry (approximately 60 percent). Various chemicals including arsenic, chromium, silver, and organic solvents (i.e., primarily reagent alcohol, which contains 90 percent ethyl alcohol, five percent isopropyl alcohol, and five percent methanol; and small quantities of acetone, ethyl acetate, isopropyl alcohol, methyl ethyl ketone, and toluene) are associated with manufacturing these chemically treated paper strips. Manufacturing wastes generated at the facility are collected and stored on the first floor of Building #2 in an open warehouse area. At the time of the site visit, BBL observed the following sealed 55-gallon steel drums in this warehouse area: three drums labeled as "hazardous waste," two drums labeled as "non-regulated waste," four drums labeled as "flammable," and various cardboard boxes containing various small containers of chemicals (lab packs). Since this area appears to be a high traffic area and no secondary containment for the drums labeled as "hazardous waste" was observed, a separate storage area or building should be considered. Based on the results of the VISTA database search, the ETS facility was listed in only one of the databases searched, as a small quantity hazardous waste generator.

The facility is currently connected to a municipal water supply and sewer system. Prior to 1992, sanitary and process wastewaters discharged to two septic systems, which were located south and east of Buildings #1 and

#2. Liquid from each of the septic tanks was sampled in 1992 and the results indicate that the tank on the east side of Building #2 contained toluene at a concentration of 54 parts per billion (ppb), and the tank located on the south side of Building #1 contained 1,1-dichloroethene and 1,1,1-trichloroethane at concentrations of 1,940 ppb and 2,770 ppb, respectively. ETS has indicated that these tanks were emptied, crushed, and abandoned in place in 1992.

There are two dryer units at the facility where chemical reagents are applied to paper that is then run through the dryer unit. The dryer units generate volatile organic compound (VOC) emissions that are released through an air stack directly to the outside of the building. These emissions are currently regulated by the Indiana Department of Environmental Management (IDEM). According to ETS personnel, the emissions generated by each of the dryer units at the facility are well below the IDEM permitted limits.

No aboveground storage tanks (ASTs) or underground storage tanks (USTs) were observed by BBL during the site visit. According to ETS personnel, an underground concrete containment tank was removed from the facility in 1997. The tank, which was located along the west side of Building #3, was to contain any potential liquid spills generated by Dryer #2. A catch basin located beneath Dryer #2 was designed to convey the liquid to the tank. According to ETS personnel, the catch basin has been sealed and the tank had no outlet and was not used prior to removal.

Recommendations

Based on the results of the Phase I Environmental Site Assessment (ESA), BBL recommends the following Phase II ESA sample collection and analysis program for the ETS property.

Areas of Interest	Estimated Number of Sample Locations	Media of Interest/ Type of Sample	Recommended Analyses	Rationale
Former Septic System Tanks (crushed and left in place)	Install up to two temporary wells to five feet below the water table (approximately 10' below ground surface [bgs]) in the immediate vicinity of the two septic system tanks.	Up to two soil samples (one soil sample from a depth near the bottom of each tank); up to two groundwater samples (one groundwater sample from each temporary well location), if encountered.	Target Compound List (TCL) VOCs, TCL semi-volatile organic compounds (SVOCs), Target Analyte List (TAL) inorganics.	Assess possible subsurface effect of the former septic tanks.
Former Septic System Leach Fields (left in place)	Install up to four temporary wells to five feet below the water table (approximately 10' bgs within the two leach fields).	Up to four soil samples (one unsaturated soil sample from a depth at or below the depth of the leach field pipes); up to four groundwater samples (if encountered) from the leach fields.	TCL VOCs, TCL SVOCs, TAL inorganics.	Assess possible subsurface effect of the former leach fields.

Figures

- 1 Property Location Map
- 2 Property Map
- 3 Buildings #1 and #2 Floor Plan - First Floor
- 4 Buildings #1 and #2 Floor Plan - Second Floor

Appendices

- A VISTA Information Solutions, Inc. - National Radius Survey
- B Selected Site Photographs
- C Quarterly Air Monitoring Reports for Dryer Emissions
- D Hazardous Waste Manifests
- E November 10, 1997 Letter from the City of Elkhart Sewer Department to ETS
- F ETS Guidance List for Disposal of Chemicals
- G Chemicals Used in Reagent Test Strips
- H IDEM Correspondence Regarding Removal of Underground Concrete Containment Tank
- I EDR Database Search Report
- J Results of Environmental Study Performed Following Fabwel Plastics Chemical Fire
- K Analytical Results of Septic Tank Samples
- L Correspondence Regarding Air Emissions Violations

1. Introduction

1.1 Purpose

The purpose of this Phase I Environmental Site Assessment (Phase I ESA) is to identify readily apparent existing or potential conditions at the Environmental Test Systems, Inc. (ETS) facility located in Elkhart, Indiana, that may pose a potential environmental liability or restriction to land use. Properties within an approximate one-mile radius of the site were also assessed through a database review to identify potential off-site environmental concerns.

1.2 Tasks

The following tasks were performed as part of the Phase I ESA:

- A records review, consisting primarily of a review of the facility files, as provided by ETS personnel; collection and review of readily available aerial photographs of the facility; and acquisition and review of an ASTM-type radius search profile from VISTA Environmental, Inc. (VISTA). The VISTA report is provided as Appendix A. Blasland, Bouck & Lee, Inc. (BBL) also requested information under the Freedom of Information Act (FOIA) from the United States Environmental Protection Agency (USEPA) and the Indiana Department of Environmental Management (IDEM) pertaining to environmental concerns for the ETS facility.
- A site reconnaissance, conducted by two BBL staff members on April 14, 1999. The reconnaissance primarily focused on current and past operations at the facility with an emphasis on the raw chemical and waste handling practices. A reconnaissance of adjacent properties was also completed to provide a preliminary evaluation of the potential impact the site may have on adjacent properties, or the potential impact the adjacent properties may have on the site. Information pertaining to the site's geology and hydrogeology was also reviewed.
- Interviews with persons possessing knowledge of current and past operations at the facility were conducted by BBL personnel. Mr. James Demarest, ETS Group Vice President, was the key ETS employee interviewed. Additional employees were also interviewed to clarify specific information such as material and waste handling practices. The objective of the interviews was to confirm the information gathered during the site reconnaissance and to further clarify current and past operating procedures, and material and waste handling practices.
- Report preparation including a summary of recommendations based on the Phase I ESA findings.

In addition, at the request of Danaher Corporation (Danaher) and with permission of the property owner (Ludwig Investments, Inc.), BBL personnel also conducted a preliminary site walkover of the adjacent properties to the east (53471 Marina Drive and 23537 County Road 106). According to Mr. James Demarest, ETS is in the process of acquiring these properties to facilitate expansion of their operations.

1.3 Report Organization

This Phase I ESA Report is presented in eight sections. Section 1 presents the scope of the Phase I ESA activities, organization of the report, and the limitations of the ESA. Section 2 presents an overview of the ETS property and buildings. Section 3 presents a site background and operating history of the ETS facility. Section 4 presents a description of the environmental setting for the ETS property, including a brief description of the regional geology. Section 5 presents the findings of the site walkover performed at the facility, which consists of a detailed description of the facility and current operations. Section 6 presents a summary of the environmental/regulatory agency inquiries performed for the facility. Section 7 presents the conclusions of the Phase I ESA, and recommendations for further assessment activities. Section 8 presents a list of references that were used during the Phase I ESA.

1.4 Limitations of the ESA

The conclusions reached are based on the limits of the assessment described in this report. BBL can offer no assurances and assumes no responsibility for site conditions or activities that were outside the scope of the inquiry as documented in this report.

It is understood by Danaher that BBL has relied on the accuracy of documents, oral information, and other material and information provided by sources documented in this report, including ETS. There can be no assurance, and BBL offers no assurance, that site conditions do not exist, or will not exist in the future, that were undetected and that could lead to liability in connection with the site. Similarly, past and present activities on the site indicating the potential for the existence of environmental concerns may not have been discovered by BBL's inquiries. Such activities may include those that would indicate the potential for regulated hazardous substances at the site. BBL has reviewed the information obtained in its limited assessment, in keeping with existing applicable environmental consulting standards and enforcement practices, but cannot predict what actions any given agency may take presently or what standards and practices may apply to the site in the future.

In performing its assessment, BBL has used reasonable care and has performed its services in keeping with applicable environmental consulting standards and appropriate standard agency procedures.

This report and other instruments of service are prepared for, and made available for the sole use of Danaher, and the contents thereof may not be used or relied upon by any other person without the express written consent and authorization of BBL.

2. Site Overview

The ETS facility is located at 23575 County Road 106 in the township of Osolo in Elkhart County, Indiana (see Figure 1). The general layout and activities of the ETS facility are discussed below. Additionally, selected photographs of the facility are provided in Appendix B and include:

- Photo 1 - ETS property;
- Photo 2 - West side of ETS building;
- Photo 3 - Storage area, building #3;
- Photo 4 - Finished product storage, building #2;
- Photo 5 - Labeling and packaging area, building #3;
- Photo 6 - Hazardous waste storage, building #2;
- Photo 7 - City of Elkhart storage, building #3;
- Photo 8 - Northern portion of ETS property;
- Photo 9 - Adjoining property to west, voyager; and
- Photo 10 - Adjoining property to east, native hardwoods.

2.1 Site Layout

The ETS facility is located on approximately 4.4 acres northeast of the City of Elkhart, Indiana. The property is comprised of three attached buildings (Buildings #1, #2, and #3), Figure 2. Building #1 is the original building constructed in 1985. Buildings #2 and #3 were added in 1989 and 1994, respectively. The combined buildings total approximately 40,000 square feet. The metal buildings with a concrete slab on grade foundation are located along the western side of the property and adjacent to County Road 106.

The facility is connected to a municipal water supply and uses an on-site 2-inch well located east of Building #1 for the water source for the fire protection sprinkler system. Prior to 1992, the facility was connected to a septic leaching system and process wastewaters discharged to two septic systems. These septic systems were located south and east of Buildings #1 and #2. Since 1992, sanitary and process wastewaters have been discharging to the City of Elkhart publicly-owned treatment works (POTW).

Two dumpsters were observed at the eastern side of the facility: one for general trash disposal and one recyclable paper materials. Manufacturing wastes generated at the facility are collected and stored on the first floor of Building #2 in an open warehouse area. Waste streams generated at the facility are described in Section 5.1.2.

Paved parking areas are located to the north and east of the three buildings and comprise most of the remaining property. The northernmost portion of the property is an open lawn area. A drainage swale conveys surface-water runoff eastward along the northern property boundary and then southward along a portion of the eastern property boundary.

The ETS facility is located within an area known as Northland Industrial Park. The ETS property is bounded to the north, east, and west by other manufacturing facilities. The property is bounded to the south by County Road 106. Residential properties are located directly south of County Road 106.

2.2 Site Activities

The primary activity conducted at the ETS facility is manufacturing of paper test strips. These test strips are chemically treated paper strips used for testing chemical presence and/or quantities for several applications. The test strips produced by the ETS facility are primarily used in the pool and spa industry, however, ETS produces a

variety of different test strips for several applications. In addition to manufacturing, the ETS facility houses laboratories for product research and development, and offices for administration and marketing.

3. Site Background/Operating History

3.1 General

The Elkhart County Assessor provided BBL with the following historical record of ownership for the current ETS property:

Owner	Date of Ownership
Environmental Test Systems, Inc.	1991 - 1999
G & S Properties	1986 - 1991
Ludwig Allan J. & David J. Miller	1986 - 1986
Delcorp, Inc.	1985 - 1986
Ludwig Allan J. & David J. Miller	1985 - 1985
Bennet, Steve R.	1983 - 1985
Ludwig, Allan J. & David J. Miller	1983
Dawn Realty	1983
Century Motor Coach	1983
Dygert, David L. & Phyllis B.	1973 - 1983
Baker, Ernest R. & Minola A.	1962 - 1973

ETS was formerly a division of Miles Laboratories, Inc. In 1985, Mr. Harry Stephenson purchased the division from Miles and relocated operations to the current County Road 106 property. According to ETS, Mr. Stephenson is currently retained as a consultant by ETS. The original ETS facility was constructed in 1985 on this property and consisted of one building (currently known as Building #1). Since originally constructed in 1985, Building #2 and Building #3 have been added to the original structure. ETS was purchased by Hach Company in April 1998, however, operations at the facility have generally remained unchanged under the new ownership (ETS, 1999). ETS continues to operate as a wholly-owned subsidiary of Hach Company.

Currently site operations include raw materials storage, research and development, manufacturing, packaging, finished product storage, quality assurance testing, administration, and marketing.

ETS manufactures over 200 products that are distributed worldwide. The majority of their products (approximately 60 percent) are sold to the pool and spa industry under the brand name AquaCheck™. These products consist of test strips used for testing chemical levels in pool and spa water. Approximately 25 percent of their products are used to test chloride levels in mortar. This product is sold under the name QuanTab™ and is sold mostly in Japan. The remainder of their products include test strips for testing chemical levels in soil, industrial water, and automotive fluids (ETS, 1999).

3.2 Aerial Photograph Interpretation

Aerial photographs of the ETS facility and surrounding area were obtained by BBL from the United States Department of Agriculture (USDA) Soil Conservation Service (SCS) and the Elkhart County Planning Department for the years 1938, 1957, 1965, 1987, and 1993. Aerial photographs were obtained by BBL from Environmental Risk Information and Imaging Services (ERIIS) for the years 1952, 1979, 1981, and 1992 (ERIIS, 1999). Presented below are descriptions of the ETS property and surrounding properties based on interpretations of the aerial photographs reviewed by BBL.

1938 (1" = 660')

- The ETS property appears to be undeveloped and used as agricultural land.
- Properties surrounding the ETS property to the north, south, east, and west are sparsely developed and appear to be used for agricultural and residential purposes. County Road 106 is present south of the ETS property.

March 29, 1952 (1" = 573')

- The ETS property remains undeveloped and used for agricultural land.
- The surrounding areas to the north, south, east, and west of the property continue to be sparsely developed with apparent residential/agricultural buildings. Also, approximately 400 feet south of the property and south of County Road 106 is a surface-water body. This surface-water body is approximately 600 feet wide in an east-west direction and 300 feet wide in a north-south direction.

1957 (1" = 660')

- The ETS property and surrounding properties to the north, east, and west continue to be sparsely developed and used for agricultural and residential purposes.
- Areas south of the ETS property and County Road 106 are newly developed as residential properties.

1965 (1" = 660')

- The ETS property and surrounding properties to the north, east, and west continue to be sparsely developed and used for agricultural and residential purposes.
- Residential properties are located south of the ETS property and County Road 106.

November 18, 1979 (1" = 660')

- The ETS property appears to be undeveloped; however, the surrounding areas to the north, east, and west have been developed as apparent commercial/industrial facilities, some with large structures.
- A large area of residential housing is shown south of the ETS property. It appears that the 600- by 300-foot surface-water body has been filled or drained to accommodate the residential housing complex.

May 2, 1981 (1" = 660')

- No obvious changes from the 1979 aerial photograph.

1987 (1" = 660')

- The ETS property has been developed with the construction of the original ETS facility (Building #1).
- Surrounding properties to the east, north, and west of the subject site are developed as industrial facilities. These properties were apparently developed as part of the Northland Industrial Park.
- A large area of residential housing is located south of the ETS facility and County Road 106.

April 5, 1992 (1" = 660')

- The aerial photograph shows the original ETS facility (Building #1).
- The surrounding areas to the north, east, and west remain developed as industrial facilities.
- A large area of residential housing remains south of the ETS property and County Road 106.

1993

- The ETS facility has been expanded to include the original structure (Building #1), and an adjoining addition (Building #2).
- Surrounding properties to the east, north, and west of the ETS property remain industrial facilities.
- A large area of residential housing remains south of the ETS facility and County Road 106.

4. Environmental Setting

Information presented in the USDA SCS document entitled "Soil Survey of Elkhart County, Indiana" (SCS, 1974) indicates that the ETS property is located in the Kamakee Outwash and Lacustrine Plain physiographic province. The SCS reports that Elkhart County has an average annual daily maximum temperature of 60°F, an average daily minimum temperature of 39°F, and receives an average annual rainfall of 34.4 inches. Overburden in this area is classified as the Atherton Formation. This formation consists of an undifferentiated glacially-derived outwash, composed primarily of sand and gravel (Indiana Department of Natural Resources [IDNR], 1989). Soils in this area consist of the Plainfield Series and the Brems Series. Both of these soil types are deep, coarse-textured soils that are formed in outwash plains and knolls. These soils are moderately to excessively well drained and are nearly level to moderately sloping. Groundwater is located approximately 5 to 10 feet below grade according to the SCS soil survey report.

Bedrock underlying the ETS property is composed of the Mississippian Ellsworth Shale Formation. This bedrock is located at depths ranging from 50 to 150 feet below grade and is approximately 300 feet thick (IDNR, 1987).

Based on a review of the United States Geological Survey (USGS) topographic map for the area (USGS, 1961), the ETS property and surrounding area is relatively flat, sloping gently southwest toward the St. Joseph River, which is approximately 1.3 miles south of the site. Surface elevations on the property range from approximately 770 to 775 feet above mean sea level. Based on the topography, shallow groundwater is expected to flow southwest toward the St. Joseph River.

A two-inch well was observed on the ETS property immediately east of Building #1, and is apparently used for the building's fire sprinkler system. An adjacent property east of the ETS site (currently used by Native Hardwoods) has a 2-inch well on site that is used for drinking water. Two wells were also observed on the property at 53471 Marina Drive, that is located east of the Native Hardwoods site. These wells consist of one 2-inch well used for drinking water and one 4-inch well used for the lawn irrigation system. No details about the construction or analytical test data were available for these wells.

BBL contacted the Elkhart County Water Department about the drinking water source for the municipal water supply. The agency indicated that the municipal water was drawn from the St. Joseph River and was conditioned before delivery to residents and certain industries (including the ETS facility) in the county (Elkhart County Water Department, 1999b).

5. Site Walkover

5.1 Site Observations

A site walkover was conducted by two BBL staff members on April 14, 1999, to observe current activities and conditions at the site. The site walkover included a tour of the facility with Mr. James Demarest, Group Vice President of ETS, and a walkover of the surrounding exterior of the ETS property.

Exterior areas consisted of two concrete loading docks, parking areas, and open lawn areas. Key areas observed inside the facility during the tour are shown on Figures 3 and 4, and include:

- Office areas;
- Storage areas;
- Laboratories;
- Chemical mixing and process rooms; and
- Product assembly and packaging areas.

In general, the facility consists of three attached metal buildings constructed on concrete slab foundations. Portions of Buildings #1 and #2 consist of a first and second floor. Building #3 has a first floor only. The buildings are heated with natural gas-fueled furnaces and are cooled with roof-mounted heating, ventilation, air conditioning (HVAC) units.

The southern portion of the site is composed of a lawn area and an access driveway to County Road 106. County Road 106 borders the site to the south, and further south is an area developed with residential housing. The eastern portion of the site consists of parking areas and a lawn area. Two dumpsters were observed on the east side of the parking lot. One dumpster is used for general trash and one is used for recyclable paper materials. Both of the containers are serviced by Himco, Inc. A two-inch well was also observed immediately east of Building #1, which is used for the building's fire sprinkler system, and a manhole was also observed on the east side of the building. The manhole was installed to allow the City of Elkhart to sample effluent wastewater from ETS prior to entering the publicly-owned sanitary sewer system. Further east is the property currently used by Native Hardwoods and additional industrial properties.

The northern portion of the site consists of a parking area and a lawn area. A drainage swale is located near the northern boundary of the site and more industrial properties are further to the north. At the time of the site visit, no water was observed in the portion of the swale that is located along the northern property boundary. Shallow water was noted near the northeast corner of the site, where this drainage swale joins a north-south swale. No sheens were observed. The western portion of the site consists of a lawn area. Along the western property boundary, BBL also observed two power transmission poles with three transformers on each pole that were marked "non-PCB." An adjoining property to the west is occupied by Voyager, Inc., and additional industrial properties are located further to the west.

The interior conditions of key areas observed in each building are described below.

5.1.1 Building #1

The following key areas comprise Building #1:

- First Floor
- Office area and conference room;

-
- Former mix room;
 - Dryer #1;
 - Foiler room (used for packaging test strips); and
 - Raw material storage area.

- Second Floor

- Office area;
- Quality assurance (QA) sample storage area; and
- Mechanical room.

Presented below is a description of each of the key areas observed in Building #1.

Office Areas and Conference Room

The office areas and conference room in Building #1 are located in the westernmost portion of the building on both the first and second floors. The office areas consist of typical cubicle office space with some permanent offices along the exterior walls of the building. Both the office areas and conference room were carpeted, neat, and clean at the time of the site visit.

Former Mix Room

The former mix room is located in Building #1 on the first floor adjacent to the conference room. This room was formerly used to prepare chemical reagents used to produce test strips according to Mr. Demarest. Currently this room is used for miscellaneous storage. The former mix room was neat and clean at the time of the site visit. The mix room that is currently used at the facility is located in Building #3. No sumps or drains were observed in this room at the time of the site visit.

Dryer #1

Dryer #1 is located on the first floor of Building #1 adjacent to the former mix room. Dryer #1 is the smaller of two dryer units at the facility used to dry chemical reagents after they have been applied to paper. Paper is dipped into a pan of chemical reagent and then run through the dryer unit. A small closet is located adjacent to Dryer #1. Chemical reagent, which varies based on production needs, is stored in a plastic container in the closet and is manually pumped to the pan of the dryer when necessary. Rolls of paper are run through the dryer in batches. Any chemical reagent remaining in the pan following completion of a batch is either pumped back into the container in the closet or containerized and stored for off-site disposal according to Mr. Demarest. Dryer #1 is manned by an ETS employee when in operation. During the site visit, the room containing Dryer #1 appeared neat and well kept, and no noticeable odors were noted in the vicinity of Dryer #1. BBL personnel did not observe any drains or sumps in the area.

The dryer unit generates emissions containing volatile organic compounds (VOCs) that are released through an air stack directly to the outside of the building. These emissions are currently regulated by IDEM. ETS has provided BBL with a copy of the last four air monitoring quarterly reports that have been submitted to IDEM by ETS for the dryer emissions (a copy is provided as Appendix C). According to ETS personnel, the emissions generated by each of the dryer units at the facility are well below the IDEM permitted limits (ETS, 1999).

Foiler Room

The foiler room is located on the first floor of Building #1 adjacent to Dryer #1. The foiler room contains equipment used to package test strips individually in foil. Scrap foil generated during the process is collected and disposed of as a non-hazardous material. This area was neat, clean, and well kept during the site visit.

Raw Material Storage Area

A portion of Building #1 is an open, one-story warehouse area used to store raw materials used in the production process (e.g., rolls of paper, polystyrene, empty plastic bottles). These materials are stored on racks along the exterior walls of the warehouse area (Appendix B, Photo 3). Forklifts are used to retrieve and transport the raw materials, making this a high traffic area. At the time of the site visit, this area was clean and well organized.

QA Sample Storage Area

This area is located on the second floor of Building #1 and is used to store samples of finished product for future QA tests and potential product liability issues. The samples are stored in cardboard boxes and tracked by lot number. This area was clean and well organized during the site visit.

Mechanical Room

This area is located on the second floor of Building #1, adjacent to the QA sample storage area. The mechanical room contains equipment used to condition air that is used in Dryer #1. Outside air is allowed into the mechanical room through an open vent in the exterior wall of the building. The air is then sent through equipment to remove moisture, and then to Dryer #1 located in the room directly beneath the mechanical room. During the site visit, the mechanical room was clean, and no noticeable odors were noted.

5.1.2 Building #2

The following key areas comprise Building #2:

- First Floor
 - Light box room;
 - Quantab room;
 - Hazardous waste storage area;
 - Raw material and finished product storage area;
 - Two wet labs; and
 - Instrumentation lab.
- Second Floor
 - Miscellaneous storage areas;
 - Walk-in cooler used for chemical storage; and
 - Office area.

Presented below is a description of each of the key areas observed in Building #2.

Light Box Room

The light box room is located on the first floor of Building #2 and houses light boxes that simulate different types of light (e.g., sunlight, white fluorescent light). The light boxes are used to test the precision of the color-change test strips under certain light conditions. Samples of finished product test strips are stored in heated containers also located in the light box room. The heated containers are used to test the stability of the test strips under increased temperatures. The light box room was neat and clean at the time of the site visit.

Quantab™ Room

The Quantab™ room is located on the first floor of Building #2, adjacent to the light room. Quantab™ is a specific type of test product produced at ETS that involves the lamination of chemically treated paper test strips. The Quantab™ room houses the equipment used to assemble and laminate the Quantab™ test strips. Wastes generated in the Quantab™ room include scrap laminate and chemically treated paper. The scrap paper is stored in a lined waste basket labeled "hazardous waste" due to the use of cyanide and arsenic in the Quantab™ treating process (ETS, 1999). The Quantab™ room was neat and clean at the time of the site visit.

Hazardous Waste Storage Area

According to ETS personnel, waste that is generated at the facility is collected and stored on the first floor of Building #2, in an open warehouse area. During the site visit, BBL observed the presence of closed 55-gallon steel drums in this warehouse area (Appendix B, Photo 6). Three drums in this area were labeled as "hazardous waste" and two drums were labeled as "non-regulated waste." Each of these drums was placed on wooden skids above the concrete floor. Four additional drums were labeled as "flammable" and were placed in spill containment vessels (plastic tubs). Also observed in this area were open drums and cardboard boxes containing various small containers of chemicals. ETS indicated that these chemicals were identified during general housekeeping practices as out-of-date (expired) chemicals and were being accumulated to complete a lab pack that would be shipped off-site for disposal (ETS, 1999). At the time of the site visit, the hazardous waste storage area was observed to be a very high traffic area. This area appeared to be neat and clean during the site visit. No sumps, floor drains, or signs of staining or leaks were observed.

According to ETS personnel, there are four general waste streams generated by the manufacturing process at the ETS facility. These waste streams include:

- Hazardous solids consisting primarily of scraps of paper treated with reagents such as chromium, silver, and arsenic;
- Hazardous liquids consisting of leftover chemical reagents such as chromium, silver, and arsenic;
- Flammable liquids consisting of leftover chemical reagents such as organic solvents (i.e., primarily reagent alcohol, which contains 90 percent ethyl alcohol, five percent isopropyl alcohol, and five percent methanol; and small quantities of acetone, ethyl acetate, isopropyl alcohol, methyl ethyl ketone, and toluene); and
- Non-regulated waste consisting of liquid wastes that contain concentrations of chemicals that are above the City of Elkhart's sewer discharge limits but are not regulated by IDEM or the USEPA.

In addition to the above waste streams, lab packs consisting of various out-of-date chemicals in small quantities are occasionally shipped off-site for disposal (ETS, 1999). ETS has provided BBL with copies of the signed hazardous waste manifests documenting the most recent (February 2, 1999) off-site shipments of hazardous waste from the ETS facility. Copies of these manifests are provided as Appendix D.

ETS personnel indicated that some liquid wastes generated at the facility are disposed of through the sink drains that are connected to the City of Elkhart sewers. According to ETS, these wastes are within the City of Elkhart sewage disposal limits. ETS has provided BBL with a copy of a letter from the City of Elkhart Sewer Use Pretreatment/Enforcement Director (Appendix E), which states that the ETS facility was not required to obtain an industrial wastewater discharge permit. ETS has also provided BBL with a guidance list that is used by ETS employees to determine the appropriate disposal of chemical wastes. A copy of this guidance list is also provided in Appendix F.

Raw Material and Finished Product Storage Area

A small portion of the open warehouse area in Building #2 is used to store raw materials (e.g., large rolls of paper and empty plastic bottles) and finished products (Appendix B, Photo 4). These materials were stored on racks and transported via forklifts, making this a high traffic area. At the time of the site visit, this area appeared very clean and well organized.

Wet Labs #1 and #2

Two wet laboratories are located on the first floor of Building #2. These laboratories are used by ETS for research and development. The laboratories consist of lab tables, various lab equipment, and small quantities of chemicals stored on shelves and in cabinets. The wet labs appeared to be clean, neat, and well organized at the time of the site visit.

Instrumentation Lab

An instrumentation laboratory is located on the first floor of Building #2, adjacent to wet lab #2. The instrumentation lab houses various small chemical testing equipment and computer systems used in the research and development of new products. The lab was clean and neat at the time of the site visit.

Miscellaneous Storage Areas

Two miscellaneous storage areas are located on the second floor of Building #2. These areas are used to store materials, such as new empty 55-gallon drums, empty cardboard containers, miscellaneous computer and office equipment, and record files. These areas appeared clean and neat during the site visit.

Walk-In Cooler

A metal walk-in cooler (approximately 5 feet wide by 10 feet long) is located on the second floor of Building #2, adjacent to one of the miscellaneous storage areas. The cooler is used to store small quantities (i.e., less than 5 gallons) of chemicals used at the facility that require refrigeration. The interior of the cooler was neat, clean, and well organized at the time of the site visit.

Office Area

The southeastern corner of the second floor of Building #2 is comprised of an office area. The office area consists of typical cubicle office space with some permanent offices along the exterior walls of the building. The office area was carpeted, neat, and clean at the time of the site visit.

5.1.3 Building #3

The following key areas comprise Building #3:

- Mix room;
- Dryer #2;
- Slitting and assembly room;
- Fill and cap room;
- Labeling and packaging area;
- Finished product storage area; and
- Office area.

Presented below is a description of each of the key areas observed in Building #3.

Mix Room

The mix room is located along the northern exterior wall of Building #3. The mix room is used to prepare chemical reagents that are applied to paper in the production of test strips. The mix room contains various chemicals (e.g., reagent alcohol, citric acid, hydrochloric acid) in small quantities (i.e., less than 5 gallons) stored on shelves and in cabinets. A partial list of these chemicals provided by ETS is included in Appendix G.

The floor of the mix room is concrete and there is one collection sump in the concrete floor. The collection sump is approximately 4 feet long by one foot wide by 6 inches deep and is covered with a steel grid. According to ETS personnel, the sump is for the collection of potentially-spilled chemicals and has no outlet (ETS, 1999). The sump appeared clean and dry at the time of the site visit. No spills were reported by ETS (ETS, 1999).

Dryer #2

Dryer #2 is the largest of the two dryer units at the facility and is located adjacent to the mix room in Building #3. Similar to Dryer #1, chemical reagents are applied to paper that is then run through the dryer unit. According to ETS personnel, Dryer #2 is the newer, more efficient dryer unit at the facility capable of treating larger quantities of paper in a much shorter time period than Dryer #1 (ETS, 1999). The room housing Dryer #2 was neat and clean at the time of the site visit.

Similar to Dryer #1, emissions from Dryer #2 containing VOCs are released to the atmosphere via an air stack located on the outside of the building. As previously mentioned, dryer emissions from the ETS facility are currently regulated by IDEM. Appendix C provides a copy of the last four quarterly air monitoring reports submitted to IDEM by ETS.

Slitting and Assembly Room

The slitting and assembly room is located adjacent to Dryer #2 in Building #3. In the slitting and assembly room, large rolls (approximately 24 inches wide) of chemically treated paper are slit into smaller-width rolls of paper (approximately 0.20 inches wide). The smaller-width chemically treated paper is then adhered to 5-inch by 10-inch cards. Each card includes several strips of paper treated with different chemical reagents. Each of the machines used for slitting and card assembly is operated by an ETS employee. Wastes generated in the slitting and assembly room included scraps of chemically treated paper that were stored in lined waste baskets labeled "waste." The slitting and assembly room was neat and clean at the time of the site visit.

Fill and Cap Room

The fill and cap room is located adjacent to the slitting and assembly room in Building #3. In the fill and cap room, the 5-inch by 10-inch cards assembled in the slitting and assembly room are placed into a machine and cut into 50 individual test strips. The test strips are then automatically placed into plastic bottles and capped. ETS employees in the fill and cap room remove filled bottles from a conveyor and place them into cardboard boxes for labeling and packaging. The fill and cap room was neat and clean at the time of the site visit.

Labeling and Packaging Area

Labeling and packaging is performed in a central open area of Building #3 (Appendix B, Photo 5). The labeling and packaging area contains machines that apply labels to the filled bottles and then package the bottles using clear plastic that is blistered onto a cardboard backing. Several ETS employees operate the labeling and packaging machines located in this area and transfer the finished product into cardboard boxes for storage. The labeling and packaging area was neat and clean at the time of the site visit.

Finished Product Storage Area

A portion of the open area in Building #3 is used to store finished product (Appendix B, Photo 3). Packaged test strips are stored in cardboard boxes on wooden skids in this area. This area appeared clean and well organized at the time of the site visit.

Office Area

An office area is located in Building #3 along the eastern exterior wall of the building. These offices consist of painted concrete floors and dividing walls that are half wood and half glass. These offices were neat, clean, and well organized at the time of the site visit.

5.1.4 AST and UST Systems

No aboveground storage tanks (ASTs) or underground storage tanks (USTs) were observed by BBL during the site visit. According to ETS personnel, an underground concrete containment tank was removed from the facility in 1997. The tank was located along the west side of Building #3, and was to contain any potential liquid spills generated by Dryer #2. A catch basin located beneath Dryer #2 was designed to convey the liquid to the tank. According to ETS personnel, the catch basin has been sealed and the tank had no outlet and was not used prior to removal (ETS, 1999). A copy of correspondence between ETS's engineering firm (Dynamic Engineering, Inc.) and the IDEM regarding the removal of the concrete containment tank was provided by ETS to BBL. A copy of this correspondence is provided as Appendix H.

5.2 Transformers

ETS personnel were not aware of any polychlorinated biphenyl- (PCB-) containing transformers currently or formerly present at the facility. During the site visit, BBL did not observe any labeled PCB-containing transformers at the facility. BBL did observe two electrical poles located on the ETS property, along the western property boundary (Appendix B, Photo 2). Each pole supported three transformers that were each labeled "non-PCB."

5.3 Area Reconnaissance

An area reconnaissance was performed by BBL personnel on April 14, 1999. The reconnaissance included observing surrounding businesses and properties to assess the potential for environmental impacts. The results of the reconnaissance are discussed below.

- The properties located north, east, and west of the ETS facility are manufacturing facilities. ASV Plastics and Norcold, Inc., are located to the north (Appendix B, Photo 8). Native Hardwoods is leasing a portion of the building located east of the ETS facility to produce countertops and other components for recreational vehicles (Appendix B, Photo 10). Voyager, a company that converts cargo vans into recreational conversion vans, is located to the west of the ETS facility (Appendix B, Photo 9).
- County Road 106 is located south of the ETS facility. Residential properties are located directly south of County Road 106.

At the request of Danaher and with the permission of the property owner (Ludwig Investments, Inc.), BBL conducted a preliminary site walkover of the two facilities located directly east of the ETS facility. According to James Demarest, ETS is in the process of purchasing these properties to facilitate expansion of their operations. The results of this additional site walkover are discussed below.

- The property located directly east of the ETS facility consists of one large building that is divided into two sections. As stated above, the southern portion of this building is currently being leased by Native Hardwoods and is used to produce tabletops for recreational vehicles. The interior of the building is primarily open, with the exception of a few smaller rooms in the most southern portion of the building. Current operations in this portion of the building generate a large quantity of particulates dust that have coated the interior surfaces. The northern portion of the building is currently vacant. This area is also primarily open with the exception of some smaller rooms located along the eastern exterior wall.
- The second property to be purchased by ETS is located adjacent to the facility described above, two properties east of the current ETS facility. The second property also consists of one building, which is primarily open, with the exception of some smaller rooms in the southernmost portion of the building. The building is currently being leased by the Day's Corporation and is being used to store empty glass bottles in cardboard boxes.
- Each of the above buildings appear to be metal buildings with concrete slab on grade foundations. A drainage swale conveys surface-water runoff in an eastward direction along the northern property boundary of each of these facilities. BBL observed the presence of a vent pipe/access point located directly south of the building currently being leased by Day's Corporation. This was subsequently found to be an access point for a well used for the property's lawn irrigation system.

6. Environmental/Regulatory Agency Inquiries

6.1 VISTA Database Search

A VISTA database search of federal and state listings was performed at BBL's request in April 1999 (VISTA, 1999). The search was conducted for listings of hazardous waste compliance for the following agency databases: Superfund National Priority List (NPL); Resource Conservation and Recovery Act (RCRA) Corrective Actions (CORRACTS); state equivalent priority list (SPL); state equivalent Comprehensive Environmental Response, Compensation, and Liability Information Service (CERCLIS) list (SCL); sites currently or formerly under review by the USEPA (CERCLIS/NFRAP); RCRA permitted treatment, storage, and disposal facilities (TSD); leaking underground storage tanks (LUST); permitted solid waste landfills, incinerators, or transfer stations (SWLF); registered underground storage tanks (UST); Emergency Response Notification System of spills (ERNS); RCRA registered large quantity generators of hazardous waste (LG GEN); RCRA registered small quantity generators of hazardous waste (SM GEN), and the state spills lists (SPILLS). Each of the databases was searched within a one-mile radius of the ETS property.

Based on the results of the database search, the ETS facility was listed on only one of the above lists, the SM GEN. The USEPA identifies the site as a small quantity hazardous waste generator, meaning the facility generates between 100 and 1,000 kilograms (kg) per month of non-acutely hazardous waste. This appears to be consistent with the information provided by ETS during the site visit and with BBL's observations during the site visit.

Several sites located within one mile of the ETS facility were listed in the various VISTA databases, including the CLP Trucking Site, the HB Fuller Site, the General Fiberglass Site, the Fabwel Plastics Site, and the Kimberly, Inc. Site. The listings for each of these sites are briefly discussed below.

- The CLP Trucking Site, which is located approximately 0.24 miles northeast of the ETS property, is included on the SPILLS list. According to the information provided by VISTA, a spill of approximately 5,000 gallons of diesel fuel was reported at the site in 1994. The IDEM reported that no water bodies were affected by the spill and lists the remedial status as "partial clean-up." The CLP Trucking Site is located in an inferred hydraulically upgradient direction from the ETS facility, and the ETS property could potentially have been impacted by the spill.
- The HB Fuller Site, which is located on County Road 6 approximately 0.62 miles northwest of the site, is listed as a state equivalent CERCLIS site. This site was entered into the IDEM Voluntary Remediation Program in 1994 as a result of VOCs, semi-volatile organic compounds (SVOCs), and metals that were detected in soil and groundwater during a Phase I ESA performed in 1994. Phase II sampling at the site also detected VOCs and SVOCs in soil and groundwater samples, but these levels did not exceed the non-residential cleanup criteria for the State of Indiana. As a result of these findings, the IDEM issued a Certificate of Completion for the project on February 11, 1998. The facility also qualifies for a Covenant-Not-To-Sue, which will be issued by the Governor of the State of Indiana.
- The General Fiberglass Site, which is located approximately 0.25 miles northwest of the subject site, is listed on the SPILLS list. VISTA reports that 11,000 gallons of fiberglass resin was spilled at the facility in 1991. The IDEM reports that no water bodies were affected by the spill and the spill file has been closed following remedial action.
- The Fabwel Plastics Site, which is located approximately 0.32 miles northwest of the subject site, is listed on the SPILLS list. A chemical fire occurred at the facility on March 14, 1998, and retention ponds at the site were impacted. The IDEM lists the remediation status for the site as "partial clean-up." Possible impact on the ETS Site is considered to be unlikely because the Fabwel Site appears to be hydraulically crossgradient.

- The Kimberly Inc. Site, which is located approximately 0.69 miles north of the subject site, is listed on the SPILLS list. VISTA reports that 2,500 gallons of diesel fuel was spilled at the site on July 21, 1996. The spill was contained in an on-site ditch and the IDEM reports the remedial status as "cleaned-up." This site is also listed as a small quantity hazardous waste generator.

6.2 EDR Database Search

BBL also reviewed a database search for the ETS facility performed by Environmental Data Resources, Inc. (EDR) on February 13, 1998 (copy provided as Appendix I). This report lists the ETS facility as a small quantity generator of hazardous waste under RCRA and indicated that the facility is monitored or permitted for air emissions under the Clean Air Act.

- ✕ Two LUST sites were identified by EDR on the LUST list within a one-half mile radius of the ETS facility: the Elkhart Steel Service Inc. Site and the Century Motor Coach Site. The Elkhart Steel Service, Inc. Site is located approximately 0.22 miles east of the ETS facility. The IDEM reported that a UST was leaking petroleum products and that the registered gasoline USTs at this location have been removed. Potential impacts from this leak on the ETS property are considered to be unlikely, because the Elkhart Steel Service Site is considered hydraulically crossgradient to the ETS property. The Century Motor Coach Site is located between 0.25 and 0.50 miles northwest of the ETS facility. The IDEM reported that a UST was leaking petroleum products and that the UST was still listed as active. Impact from this leak is also considered to be unlikely because of its inferred hydraulically crossgradient direction to the ETS facility.

6.3 Other Inquiries

BBL contacted the Township of Osolo Fire Department to obtain information regarding responses by the department to the area in the vicinity of the ETS facility, and to request files pertaining to the ETS facility. Mr. Randy Stone, Hazardous Materials Coordinator of the Osolo Fire Department, stated that the fire department had not responded to any spills at the ETS facility, and that the amount of chemicals stored at the site were not subject to reporting under SARA Title III. Mr. Stone also said that a chemical fire occurred on March 14, 1998, at the Fabwel Plastics plant and that this fire was investigated by IDEM and the Elkhart County Department of Health.

BBL conducted a file review at the Elkhart County Department of Health in Goshen, Indiana, to obtain information regarding the above-mentioned chemical fire. According to this information, water that was used to put out the fire collected into an on-site retention pond. VOCs and SVOCs were detected in this water, which completely dissipated within a few days of the fire through infiltration and evaporation. Soil samples collected in the retention pond area revealed that VOCs and SVOCs were not present above IDEM Cleanup Goals for non-residential properties. Groundwater was also sampled at the site and on adjoining properties. Groundwater samples collected at the site revealed benzene concentrations ranging from 3.7 to 21 parts per billion (ppb), compared to the USEPA Maximum Contaminant Level (MCL) of 5 ppb. A portion of the report presenting the results of the environmental study is provided as Appendix J. Remediation of the groundwater was not recommended, because it was determined that natural attenuation would reduce the benzene to below 5 ppb before it migrated off-site. Groundwater samples collected at adjoining properties indicated that VOCs and SVOCs were not detected.

The Elkhart County Health Department also provided information regarding two septic systems that were previously used at the ETS facility until 1992. These systems were located on the south and east sides of Buildings #1 and #2. Liquid from each of the septic tanks was sampled in 1992 and the results indicate that the tank on the east side of Building #2 contained toluene at a concentration of 54 ppb, and the tank located on the south side of Building

#1 contained 1,1- dichloroethene and 1,1,1-trichloroethane at concentrations of 1,940 ppb and 2,770 ppb, respectively. A copy of these analytical results are provided as Appendix K. ETS has indicated that these tanks were emptied, crushed, and abandoned in place in 1992. At that time the ETS facility was connected to the City of Elkhart sanitary sewer system.

The health department files also indicate that ETS received a notice of violation letter from IDEM on July 15, 1997, which indicated that they had exceeded their total VOC air emission limit of 14.9 pounds per day. The IDEM then performed an on-site visit of the ETS facility on August 19, 1997, and concluded that there were no violations under their emission permits. A copy of the correspondence regarding the supposed violation and subsequent site visit is provided as Appendix L.

As part of this Phase I ESA, BBL submitted FOIA requests to the USEPA, the IDEM Office of Emergency Response, the IDEM Office of Water Management, and the IDEM Office of Solid and Hazardous Waste. To date, BBL has received the following responses from the IDEM:

- Mr. Steven Vaughn of the IDEM Office of Water Management did not have any files related to the subject site and did not have any records of groundwater contamination from wells within one-half mile of the site.
- Ms. Glenda Oaks of the IDEM Office of Solid and Hazardous Waste did not have any records of violations associated with ETS.
- Mr. Gary Yakimiki of the IDEM Office of Emergency Response did not have any records pertaining to the ETS property.
- Mr. Damon Ridley of the IDEM Voluntary Remediation Program Office provided information related to the H.B. Fuller Site.

7. Summary and Recommendations

7.1 Introduction

The purpose of this Phase I ESA is to identify readily apparent existing or potential conditions at the ETS facility located in Elkhart, Indiana, that may pose a potential environmental liability or restriction to land use.

The following tasks were performed to complete the Phase I ESA:

- A records review of ETS facility files and IDEM files;
- A VISTA database search;
- A property walk over and area reconnaissance; and
- Interviews with key ETS personnel.

7.2 Summary

The following summarizes the key findings of the ETS (Elkhart, Indiana) Phase I ESA:

- Groundwater is located approximately 5 to 10 feet below grade (SCS, 1974). Based on topography, shallow groundwater flow in the vicinity of the site is likely southwest toward the St. Joseph River.
- Overburden in the vicinity of the site consists of glacial outwash, composed primarily of sand and gravel. Bedrock underlying the ETS property is the Ellsworth Shale Formation, which is located at depths ranging from 50 to 150 feet below grade and is approximately 300 feet thick.
- There are two dryer units at the facility, where chemical reagents are applied to paper that is then run through the dryer unit. The dryer units generate VOC emissions that are released through an air stack directly to the outside of the building. These emissions are currently regulated by IDEM. According to ETS personnel, the emissions generated by each of the dryer units at the facility are well below the IDEM permitted limits.
- No ASTs or USTs were observed by BBL during the site visit. According to ETS personnel, an underground concrete containment tank associated with Dryer #2 was removed from the facility in 1997. According to ETS personnel, the tank had no outlet and was not used prior to removal.
- Two septic systems were used at the ETS facility until 1992. Liquid from each of the septic tanks was sampled in 1992 and the results indicate that the tank on the east side of Building #2 contained toluene at a concentration of 54 ppb, and the tank located on the south side of Building #1 contained 1,1-dichloroethene and 1,1,1-trichloroethane at concentrations of 1,940 ppb and 2,770 ppb, respectively. ETS has indicated that these tanks were emptied, crushed, and abandoned in place in 1992. At that time the ETS facility was connected to the City of Elkhart sanitary sewer system.
- Based on the results of the VISTA database search, the ETS facility was listed in only one of the databases searched, SM GEN, which identifies the site as a small quantity hazardous waste generator. The ETS facility manufactures environmental test strips for several applications. Various chemicals including arsenic, chromium, silver, and organic solvents are associated with manufacturing these chemically treated paper strips.

- Waste that is generated at the facility is collected and stored on the first floor of Building #2, in an open warehouse area. At the time of the site visit, BBL observed the following sealed 55-gallon steel drums in this warehouse area: three drums labeled as "hazardous waste," two drums labeled as "non-regulated waste," four drums labeled as "flammable," and various cardboard boxes containing various small containers of chemicals (lab packs). This area appeared to be neat and clean during the site visit. No signs of staining or leaks were observed. Since this area appears to be a high traffic area and no secondary containment for the drums labeled as "hazardous waste" was observed, a separate storage area or building should be considered.

7.3 Recommendations

Based on the results of the Phase I ESA, BBL recommends the following Phase II ESA sample collection and analysis program for the ETS property.

Areas of Interest	Estimated Number of Sample Locations	Media of Interest/ Type of Sample	Recommended Analyses	Rationale
Former Septic System Tanks (crushed and left in place)	Install up to two temporary wells to five feet below the water table (approximately 10' below ground surface [bgs]) in the immediate vicinity of the two septic system tanks.	Up to two soil samples (one soil sample from a depth near the bottom of each tank); up to two groundwater samples (one groundwater sample from each temporary well location), if encountered.	Target Compound List (TCL) VOCs, TCL SVOCs, Target Analyte List (TAL) inorganics.	Assess possible subsurface effect of the former septic tanks.
Former Septic System Leach Fields (left in place)	Install up to four temporary wells to five feet below the water table (approx. 10' bgs within the two leach fields).	Up to four soil samples (one unsaturated soil sample from a depth at or below the depth of the leach field pipes); up to four groundwater samples (if encountered) from the leach fields.	TCL VOCs, TCL SVOCs, TAL inorganics	Assess possible subsurface effect of the former leach fields.

As indicated above, soil and groundwater samples will be collected and analyzed for TCL VOCs, TCL SVOCs, and TAL inorganics from predetermined locations. The above table will be used as a guide to the potential number and distribution of samples to be collected during the assessment. Based on BBL staff's observations during the investigation, the number and/or distribution of samples to be collected may be modified to optimize the effectiveness of the program.

8. References

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APPENDIX E
PHASE II ENVIRONMENTAL SITE ASSESSMENT
(Blasland, Bouck & Lee for Danaher Corporation – August 1999)

TECHNICAL REPORT

Phase II Environmental Site Assessment

*Environmental Test Systems, Inc.
Elkhart, Indiana*

Danaher Corporation
Washington, D.C.

August 1999

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Executive Summary

The purpose of this Phase II Environmental Site Assessment (ESA) is to provide an evaluation of the soil and groundwater quality at the areas of interest identified in the Phase I ESA (BBL, 1999b) for the Environmental Test Systems, Inc. (ETS) property located at 23575 County Road 106 in Elkhart, Indiana.

Based on the results of the Phase I ESA, which reviewed in part, pertinent historical and current operations, an assessment of the soil and groundwater characteristics at select locations was recommended. The following locations at ETS were selected:

- The former septic system tank and leach field located on the east side of the facility; and
- The former septic system tank and leach field located south of the facility.

The following tasks were performed as part of the Phase II ESA:

- Advanced soil borings;
- Installed temporary monitoring wells; and
- Collected soil and groundwater samples.

Field activities were completed between April 26 and 28, 1999, in accordance with the scope of work for the Phase II ESA outlined in a letter dated April 26, 1999 to Mr. James Ditkoff, Vice President of Danaher Corporation (BBL, 1999a).

To collect site-specific physical and chemical characterization information, six borings (TW-1 through TW-6) were installed at the ETS Property. Three soil borings (TW-1 through TW-3) were installed in the location of the southern former septic system, and three soil borings (TW-4 through TW-6) were installed in the location of the eastern former septic system. The six soil borings were advanced to a depth of 10 feet below ground surface (bgs). One sample per boring (total of six) were submitted to the laboratory for analysis. Temporary monitoring well points were subsequently installed at each boring location to collect groundwater quality data in these locations.

Results of the Phase II ESA activities indicate the following geologic and hydrogeologic conditions at the property:

- The property is generally underlain by 10 feet of moderately loose sand deposits with varying amounts of silt and gravel. Based on regional information, the thickness of the overburden typically varies from 50 to 150 feet.
- Groundwater was observed at approximately 5 to 6 feet bgs at both former septic system locations.
- Based on topography and surface-water drainage patterns, shallow groundwater at the ETS Property likely flows south-southwest towards the St. Joseph River.

Based on the information collected in the Phase II ESA for the ETS Property the following conclusions can be drawn:

- Two volatile organic compounds (VOCs), acetone and toluene, were detected in soil samples collected from the ETS Property. The acetone detections are believed to be due to laboratory contamination since acetone was also detected in the associated laboratory blank sample at similar concentrations. Acetone and toluene were detected in one or more soil sample analyzed, at concentrations of 22 micrograms per kilograms ($\mu\text{g}/\text{kg}$) and 9 $\mu\text{g}/\text{kg}$, respectively, which are below the Tier 1 Soil Closure Levels for acetone and toluene, as provided in the Draft Technical Resource Guidance Document prepared by the Indiana Department of Environmental Management (IDEM) (IDEM, 1999).

-
- Four semi-volatile organic compounds (SVOCs), diethylphthalate, di-n-butylphthalate, bis(2-ethylhexyl)phthalate, and di-n-octylphthalate, were detected in soil samples collected from the ETS Property. All of these SVOCs were also detected in the associated laboratory blank sample, therefore the compounds are believed to be indicative of laboratory contamination.
 - Metals were detected in soil at concentrations within the reported background range for the Eastern United States (United States Geological Survey [USGS], 1984), and below their respective Draft Tier 1 Soil Closure Levels (IDEM, 1999).
 - The VOCs acetone, methylene chloride, and toluene were detected at low part per billion concentrations in groundwater samples collected from one or more temporary well. The acetone and methylene chloride detections are indicative of laboratory contamination since both compounds were also detected in the associated laboratory blank sample at similar concentrations. Toluene was detected in groundwater samples collected from TW-1 and TW-2, at concentrations below the Draft Tier 1 Groundwater Closure Level of 1,000 micrograms per liter ($\mu\text{g/L}$) (IDEM, 1999), and the United States Environmental Protection Agency (USEPA) Maximum Contaminant Level (MCL) of 1,000 $\mu\text{g/L}$ (USEPA, 1996).
 - Eleven SVOC compounds were detected in groundwater samples collected from the site. Five of these compounds are believed to be due to laboratory contamination since these five compounds, bis(2-ethylhexyl)phthalate, butylbenzylphthalate, diethylphthalate, di-n-butylphthalate, and di-n-octylphthalate, were also detected in the associated laboratory blank at similar concentrations. The remaining six compounds, including 2-methylnaphthalene, benzoic acid, isophorone, naphthalene, phenanthrene, and phenol, were reported at concentrations below their respective Draft Tier 1 Groundwater Closure Levels (IDEM, 1999), (these compounds are not listed in the USEPA MCLs).
 - The metals aluminum, iron, and manganese were detected in groundwater samples collected from all six temporary wells at concentrations above the USEPA Secondary Drinking Water Standards (USEPA, 1996). The metals arsenic, cadmium, chromium, lead, and nickel were also detected in the groundwater sample collected from TW-3 at concentrations slightly above the MCLs and the Draft Tier 1 Groundwater Closure Levels (IDEM, 1999). Based on our current understanding of chemical use at the ETS Facility, none of these metals are believed to have been used by the facility, with the exception of arsenic and chromium.

While VOCs, SVOCs, and metals were detected in soil and groundwater samples collected from the ETS Property, the majority of the detections were either below the USEPA or Draft IDEM criteria, or within the regional range for the Eastern United States background metal concentrations. Given the limited sampling data and the focus towards locations with a higher potential for past releases, constituents that were above these criteria/concentrations appear to be localized.

The potential impact, if any, from these areas is assumed to be minimal for the following reasons:

- The contaminant levels are relatively low, even near the assumed source(s); and
- The properties are industrial in nature.

1. Objectives

1.1 Purpose

The purpose of this Phase II Environmental Site Assessment (ESA) is to evaluate the soil and groundwater quality at the areas of interest identified in the Phase I ESA (Blasland, Bouck & Lee, Inc. [BBL], 1999b) for the Environmental Test Systems (ETS) Facility located at 23575 County Road 106 in Elkhart, Indiana (Figure 1). The field activities discussed in this report were completed at the ETS Property by BBL as part of the Phase II ESA at the request of Danaher Corporation (Danaher).

1.2 Tasks

Based on the results of the Phase I ESA, which reviewed pertinent historical and current operations, an assessment of the soil and groundwater characteristics at select locations was recommended. The following locations were selected:

- The former septic system tank and leach field located on the east side of the facility; and
- The former septic system tank and leach field located south of the facility.

The following tasks were performed as part of the Phase II ESA:

- Advanced soil borings;
- Installed temporary monitoring wells; and
- Collected soil and groundwater samples.

1.3 Report Organization

This Phase II Report is presented in seven sections. Section 1 presents the objectives of the Phase II ESA activities, and the organization of the report. Section 2 presents an overview of the ETS Property and the buildings on the property. Section 3 presents a description of the environmental setting for the ETS Property, which consists of a brief description of the regional and site-specific geology. Section 4 presents a summary of the Phase I ESA results. Section 5 presents a discussion of the activities that were performed as part of the Phase II ESA. Section 6 presents a discussion of the analytical results. Section 7 presents a list of references that were used during the Phase II ESA.

1.4 Limitations to ESA

The conclusions reached are based on the limits of the assessment described in this report. BBL can offer no assurances and assumes no responsibility for site conditions or activities that were outside the scope of the inquiry as documented in the scope of work letter to Mr. James Ditkoff, Vice President of Danaher (BBL, 1999a).

Danaher understands that BBL has relied on the accuracy of documents, oral information, and other material and information provided by sources documented in this report, including ETS. There can be no assurance, and BBL offers no assurance, that site conditions do not exist, or will not exist in the future, that were undetected and that could lead to liability in connection with the site. Similarly, past and present activities on the site indicating the potential for the existence of environmental concerns may not have been discovered by BBL's assessment activities. Such activities may include those that would indicate the potential for regulated hazardous substances at the site. BBL has reviewed the information obtained in its limited assessment, in keeping with existing

applicable environmental consulting standards and enforcement practices, but cannot predict what actions any given agency may take presently or what standards and practices may apply to the site in the future.

In performing its assessments, BBL has used reasonable care and has performed its services in keeping with applicable environmental consulting standards and appropriate standard agency procedures.

This report and other instruments of service are prepared for and made available for the sole use of Danaher, and the contents thereof may not be used or relied upon by any other person without the express written consent and authorization of BBL.

2. Site Overview

The ETS Facility is located at 23575 County Road 106 in the township of Osolo in Elkhart County, Indiana (Figure 1). The general layout and operations of the ETS Facility are discussed below.

2.1 Site Layout

The ETS Facility is located on approximately 4.4 acres northeast of the City of Elkhart, Indiana. The property is comprised of three attached buildings (Buildings #1, #2, and #3). Building #1 is the original building constructed in 1985. Buildings #2 and #3 were added in 1989 and 1994, respectively. The combined buildings total approximately 40,000 square feet. The metal buildings with a concrete slab on grade foundation are located along the western side of the property and adjacent to County Road 106.

The facility is connected to a municipal water supply and use an on-site 2-inch well located east of Building #1 for the water source for the fire protection sprinkler system. Prior to 1992, the facility was connected to a septic leaching system and process wastewaters discharged to two septic systems. These septic systems were located south and east of Buildings #1 and #2. Since 1992, sanitary and process wastewaters have been discharged to the City of Elkhart publicly-owned treatment works (POTW).

Two dumpsters were observed at the eastern side of the facility: one for general trash disposal and one for recyclable paper materials. Manufacturing wastes generated at the facility are collected and stored on the first floor of Building #2 in an open warehouse area. Waste streams generated at the facility are described in Section 5.1.2.

Paved parking areas are located north and east of the three buildings and comprise most of the remaining property. The northernmost portion of the property is an open lawn area. A drainage swale conveys surface-water runoff eastward along the northern property boundary and then southward along a portion of the eastern property boundary.

The ETS Facility is located within an area known as Northland Industrial Park. The ETS Property is bounded to the north, east, and west by other manufacturing facilities. The property is bounded to the south by County Road 106. Residential properties are located directly south of County Road 106.

2.2 Site Activities

The primary activity conducted at the ETS Facility is manufacturing of paper test strips. These test strips are chemically treated paper strips used for testing chemical presence and/or quantities for several applications. The test strips produced by the ETS Facility are primarily used in the pool and spa industry, however, ETS produces a variety of different test strips for several applications. In addition to manufacturing, the ETS Facility houses laboratories for product research and development, and offices for administration and marketing.

3. Environmental Setting

3.1 Regional Setting

Information presented in the United States Department of Agriculture (USDA) Soil Conservation Service (SCS) document entitled "Soil Survey of Elkhart County, Indiana" (SCS, 1974) indicates that the ETS Property is located in the Kamakee Outwash and Lacustrine Plain physiographic province. Overburden in this area is classified as the Atherton Formation. This formation consists of an undifferentiated glacially-derived outwash, composed primarily of sand and gravel (Indiana Department of Natural Resources [IDNR], 1989). Soils in this area consist of the Plainfield Series and the Brems Series. Both of these soil types are deep, coarse-textured soils that are formed in outwash plains and knolls. These soils are moderately to excessively well drained and are nearly level to moderately sloping. Groundwater is located approximately 5 to 10 feet below grade according to the SCS soil survey report.

Bedrock underlying the ETS Property is composed of the Mississippian Ellsworth Shale Formation. This bedrock unit is located at depths ranging from 50 to 150 feet below grade and is approximately 300 feet thick (IDNR; 1970, 1987).

Based on a review of the United States Geological Survey (USGS) topographic map for the area (USGS, 1961), the ETS Property and surrounding area is relatively flat, sloping gently southwest toward the St. Joseph River, which is approximately 1.3 miles south of the property. Surface elevations on the property range from approximately 770 to 775 feet above mean sea level. Based on the topography, shallow groundwater is expected to flow south-southwest toward the St. Joseph River.

3.2 Property Observations

Based on the results of the Phase II ESA, the property is generally underlain by at least 10 feet of moderately loose sand deposits with varying amounts of silt and gravel. Based on regional information, the thickness of the overburden typically varies from 50 to 150 feet. Groundwater was observed at approximately 5 to 6 feet bgs at both former septic system locations.

4. Summary of Phase I Results

In general, the ETS Facility appeared to be neat and well kept. However, due to the nature of the chemicals that have been used at the facility, additional assessment activities were recommended.

The original ETS Facility was constructed in 1985 on this property and consisted of one building (currently known as Building #1). Buildings #2 and #3 have since been added to the original structure (in 1989 and 1994, respectively). ETS was purchased by Hach Company in April 1998, however, operations at the facility have generally remained unchanged under the new ownership (ETS, 1999). ETS continues to operate as a wholly-owned subsidiary of Hach Company.

Current site operations include raw materials storage, research and development, manufacturing, packaging, finished product storage, quality assurance testing, administration, and marketing.

In general, the facility consists of three attached metal buildings constructed on concrete slab foundations. Portions of Buildings #1 and #2 consist of a first and second floor. Building #3 has a first floor only. The buildings are heated with natural gas-fueled furnaces and are cooled with roof-mounted heating, ventilation, air conditioning (HVAC) units.

The southern portion of the site is composed of a lawn area and an access driveway to County Road 106. County Road 106 borders the site to the south, and further south is an area developed with residential housing. The eastern portion of the site consists of parking areas and a lawn area. The northern portion of the site consists of a parking area and a lawn area. A drainage swale is located near the northern boundary of the site and more industrial properties are further to the north. At the time of the site visit, no water was observed in the portion of the swale that is located along the northern property boundary. Shallow water was noted near the northeast corner of the site, where this drainage swale joins a north-south swale. No sheens were observed.

Two septic systems were used at the ETS Facility until 1992. The original septic system was within a grassy area located south of the facility. The second septic system was located in a grassy area east of Building #2. Liquid from each of the septic tanks was sampled in 1992 by the Elkhart County Health Department and the results indicated that the tank on the east side of Building #2 contained toluene at a concentration of 54 parts per billion (ppb), and the tank located on the south side of Building #1 contained 1,1-dichloroethene and 1,1,1-trichloroethane at concentrations of 1,940 ppb and 2,770 ppb, respectively. ETS has indicated that these tanks were emptied, crushed, and abandoned in place in 1992. At that time the ETS Facility was connected to the City of Elkhart POTW.

According to ETS personnel, there are four general waste streams generated by the manufacturing process at the ETS Facility. These waste streams include:

- Hazardous solids consisting primarily of scraps of paper treated with reagents, such as chromium, silver, and arsenic;
- Hazardous liquids consisting of leftover chemical reagents, such as chromium, silver, and arsenic;
- Flammable liquids consisting of leftover chemical reagents, such as organic solvents (i.e., primarily reagent alcohol, which contains 90 percent ethyl alcohol, 5 percent isopropyl alcohol, and 5 percent methanol; and small quantities of acetone, ethyl acetate, isopropyl alcohol, methyl ethyl ketone, and toluene); and

-
- Non-regulated waste consisting of liquid wastes that contain concentrations of chemicals that are above the City of Elkhart's sewer discharge limits, but are not regulated by the Indiana Department of Environmental Management (IDEM) or the United States Environmental Protection Agency (USEPA).

5. Phase II Field Activities

5.1 General

Field activities were completed between April 26 and April 28, 1999, in accordance with the Scope of Work for the Phase II ESA outlined in a letter to Danaher dated April 26, 1999. The following field activities were completed as part of the Phase II ESA:

- Soil boring installations and soil sampling;
- Installation and development of temporary monitoring wells; and
- Groundwater sampling.

A description of these activities is provided below.

5.2 Soil Boring Installation and Soil Sampling

To collect site-specific physical and chemical characterization information six borings were installed at the ETS Property from April 27 to April 28, 1999. Three soil borings (TW-1 through TW-3) were installed in the location of the southern former septic system and three soil borings (TW-4 through TW-6) were installed in the location of the eastern former septic system. The six soil borings were advanced to a depth of 10 feet bgs. Temporary monitoring well points were subsequently installed at each boring location to collect preliminary groundwater quality data in these locations. Details of the temporary monitoring well installation are discussed in Section 5.4.

Borings were advanced with a trailer-mounted CME 45 drilling rig using direct-push drilling techniques. In general, all borings were sampled at 2-foot intervals, and soil samples were collected with a split-barrel sampler. Recovered soil samples were visually classified and screened for volatile organic compounds (VOCs) using a portable photoionization detector (PID). One soil sample per boring was selected for analysis based on the highest PID measurement and observations of soil staining by BBL's field staff. Soil samples were submitted to Severn Trent Laboratories (STL) of Monroe, Connecticut, to be analyzed for USEPA SW-846 Target Compound List (TCL) VOCs using USEPA Method 8260, TCL semi-volatile organic compounds (SVOCs) using USEPA Method 8270, and Target Analyte List (TAL) inorganic constituents (including cyanide) using USEPA Methods 6000/7010 series and cyanide by Method 9010. Detected constituents in soil samples collected from the ETS Property are presented on Table 1. A detailed description of the site geology is described in Section 4 and on subsurface logs, presented in Appendix A.

Drilling equipment and associated tools that may have come in contact with soils and groundwater were cleaned with a high-pressure, hot water "steam cleaner" prior to beginning the investigation, between each soil boring, and upon completion of the field investigation. Split-barrel samplers were cleaned using a distilled water/Alconox solution with a subsequent distilled water rinse between each sampling interval.

All soils, rinse water, and purged groundwater from development and sampling were containerized in 55-gallon drums and stored within the fenced parking area north of the facility.

5.3 Installation and Development of Temporary Monitoring Wells

Temporary monitoring well points were installed at the six soil boring locations to collect further site-specific environmental information. Temporary monitoring well points TW-1 through TW-6 were installed between April 27 and 28, 1999. All well points were installed with a CME 45 trailer-mounted drilling rig using direct-push drilling techniques. TW-1 was installed as a Hydropunch™-type driven well point, but this method proved to be inefficient due to the short screened section (less than 0.5 feet of screen) quickly being blocked by silt. Therefore,

temporary wells TW-2 through TW-6 consisted of 1.5-inch-diameter Schedule 40 PVC with a 5-foot, hand-cut (cut with a hack saw) screened interval. All well material was cleaned with a high-pressure, hot water "steam cleaner" prior to installation. Each well point was installed to a depth of approximately 10 feet bgs or approximately 4 feet below the water table. Locations of temporary well points are shown on Figure 2. Subsurface soil descriptions and detailed temporary well point construction are presented in the boring logs (Appendix A).

Following installation, each temporary monitoring well received development (at least three well volumes purged) using a peristaltic pump and disposable dedicated polyethylene tubing to remove fine-grained materials that may have settled in and around the well point during installation and to promote a hydraulic connection with the surrounding formation.

All six temporary well points were abandoned upon completing groundwater sampling activities by pulling the PVC well materials, backfilling the soil boring with bentonite pellets to 6 inches bgs, and placing topsoil from 6 inches bgs to ground surface.

5.4 Groundwater Sampling

Groundwater sampling of well points TW-1 through TW-6 was conducted between April 27 and 28, 1999. Each well point was purged by removing a minimum of three well volumes of groundwater using a peristaltic pump with dedicated, disposable, polyethylene tubing prior to groundwater sampling. Field parameters of pH, temperature, salinity, turbidity, dissolved oxygen, and conductivity were recorded in the field notebook and are listed in Table 2.

Groundwater samples from the six temporary well points were submitted to STL to be analyzed for TCL VOCs using USEPA Method 8260, TCL SVOCs using USEPA Method 8270, and unfiltered TAL inorganic compounds (including cyanide) using USEPA Methods 6000/7010 series and cyanide by Method 9010. Figure 2 presents the locations of the temporary well points. Detected compounds in groundwater samples collected from the ETS Property are presented in Table 3.

All purged groundwater from development and sampling was containerized in 55-gallon drums and stored within the fenced parking area north of the facility.

6. Results and Discussion

6.1 Hydrogeologic Conditions

Results of the Phase II activities indicate the following geologic and hydrogeologic conditions at the ETS Property:

- The property is generally underlain by over 10 feet of moderately loose sand deposits with varying amounts of silt and gravel. Based on regional information, the thickness of the overburden typically varies from 50 to 150 feet.
- Groundwater was observed at approximately 5 to 6 feet bgs at both former septic system locations. Based on a review of the USGS topographic map for the area (USGS, 1961), the ETS Property and surrounding area is relatively flat, sloping gently southwest toward the St. Joseph River, which is approximately 1.3 miles south of the site. Based on the topography, shallow groundwater is expected to flow south-southwest toward the St. Joseph River.

6.2 Analytical Results

Tables 1 through 3 summarize the results of the sampling performed as part of the Phase II ESA. The soil analytical results, compared to the IDEM Draft Tier 1 Soil Closure Levels (IDEM, 1999) and the reported range of inorganic concentrations in the Eastern United States as established by the USGS (USGS, 1984), are presented in Table 1. Table 2 summarizes the field parameter measurements obtained from the groundwater removed during monitoring well development. The groundwater analytical results, compared to USEPA Federal Maximum Contaminant Levels/Goals (MCLs/MCLGs) and Draft IDEM Method A and B Cleanup Levels, are presented in Table 3. Copies of the laboratory analytical data sheets and the chain-of-custody forms are provided in Appendix B. The following summarizes the findings of the Phase II ESA:

- The VOCs acetone and toluene were detected in soil samples collected from the ETS Property. The acetone detections are believed to be due to laboratory contamination since acetone was also detected in the associated laboratory blank sample at similar concentrations. Acetone and toluene were detected in one or more soil samples analyzed, at concentrations below the Draft Tier 1 Soil Closure Levels of 768 micrograms per kilograms ($\mu\text{g}/\text{kg}$) for acetone and 3,090 $\mu\text{g}/\text{kg}$ for toluene, as provided in the Draft Technical Resource Guidance Document prepared by the IDEM (IDEM, 1999).
- Four SVOCs, diethylphthalate, di-n-butylphthalate, bis(2-ethylhexyl)phthalate, and di-n-octylphthalate, were detected in soil samples collected from the ETS Property. All of these SVOCs were also detected in the associated laboratory blank sample at similar concentrations, therefore the compounds are believed to be indicative of laboratory contamination.
- Metals were detected in soil at concentrations within the reported range for the Eastern United States (USGS, 1984), and below their respective Draft Tier 1 Soil Closure Levels (IDEM, 1999).
- The VOCs acetone, methylene chloride, and toluene were detected at low part per billion concentrations in groundwater samples collected from one or more temporary wells. The acetone and methylene chloride detections are indicative of laboratory contamination since both compounds were also detected in the associated laboratory blank sample at similar concentrations. Toluene was detected in groundwater samples collected from TW-01 and TW-02, at concentrations below the Draft Tier 1 Groundwater Closure Level of 1,000 $\mu\text{g}/\text{L}$ (IDEM, 1999), and USEPA MCL of 1,000 $\mu\text{g}/\text{L}$ (USEPA 1996).

-
- Eleven SVOC compounds were detected in groundwater samples collected from the site. Five of these compounds are believed to be due to laboratory contamination since these five compounds, bis(2-ethylhexyl)phthalate, butylbenzylphthalate, diethylphthalate, di-n-butylphthalate, and di-n-octylphthalate, were also detected in the associated laboratory blank at similar concentrations. The remaining six compounds, including 2-methylnaphthalene, benzoic acid, isophorone, naphthalene, phenanthrene, and phenol, were reported at concentrations below their respective Draft Tier 1 Groundwater Closure Levels (IDEM, 1999) (these compounds are not listed in the USEPA MCLs).
 - The metals aluminum, iron, and manganese were detected in groundwater samples collected from all six temporary wells at concentrations above the USEPA Secondary Drinking Water Standards (USEPA, 1996). The metals arsenic, cadmium, chromium, lead, and nickel were also detected in the groundwater sample collected from TW-3 at concentrations slightly above the MCLs and the Draft Tier 1 Groundwater Closure Levels (IDEM, 1999). Based on our current understanding of chemical use at the ETS Facility, none of these metals are believed to have been used by the facility, with the exception of arsenic and chromium.

6.3 Summary

Based on the Phase I results, BBL recommended that the two former septic systems be further evaluated in this Phase II ESA at the ETS Property. These recommendations focused on sampling activities and analytical methods that were matched with the potential areas of interest. For example, VOCs were recommended for analysis in the soil and groundwater near the location of the former septic tank south of the facility, where VOCs were detected in liquid sampled from the tank prior to abandonment in 1992. Also, various chemicals, including arsenic, chromium, silver, and organic solvents are associated with manufacturing the chemically-treated paper strips. As a result of these recommendations the Phase II activities were completed.

While VOCs, SVOCs, and metals were detected in soil and groundwater samples collected from the ETS Property, the majority of the detections were either below the USEPA or IDEM criteria, or within the regional range for the Eastern United States background metal concentrations for soil. Given the limited sampling data and the focused sampling bias toward locations with a higher potential for past discharges, constituents that were above these criteria/concentrations appear to be localized.

The potential impact, if any, from these areas is assumed to be minimal for the following reasons:

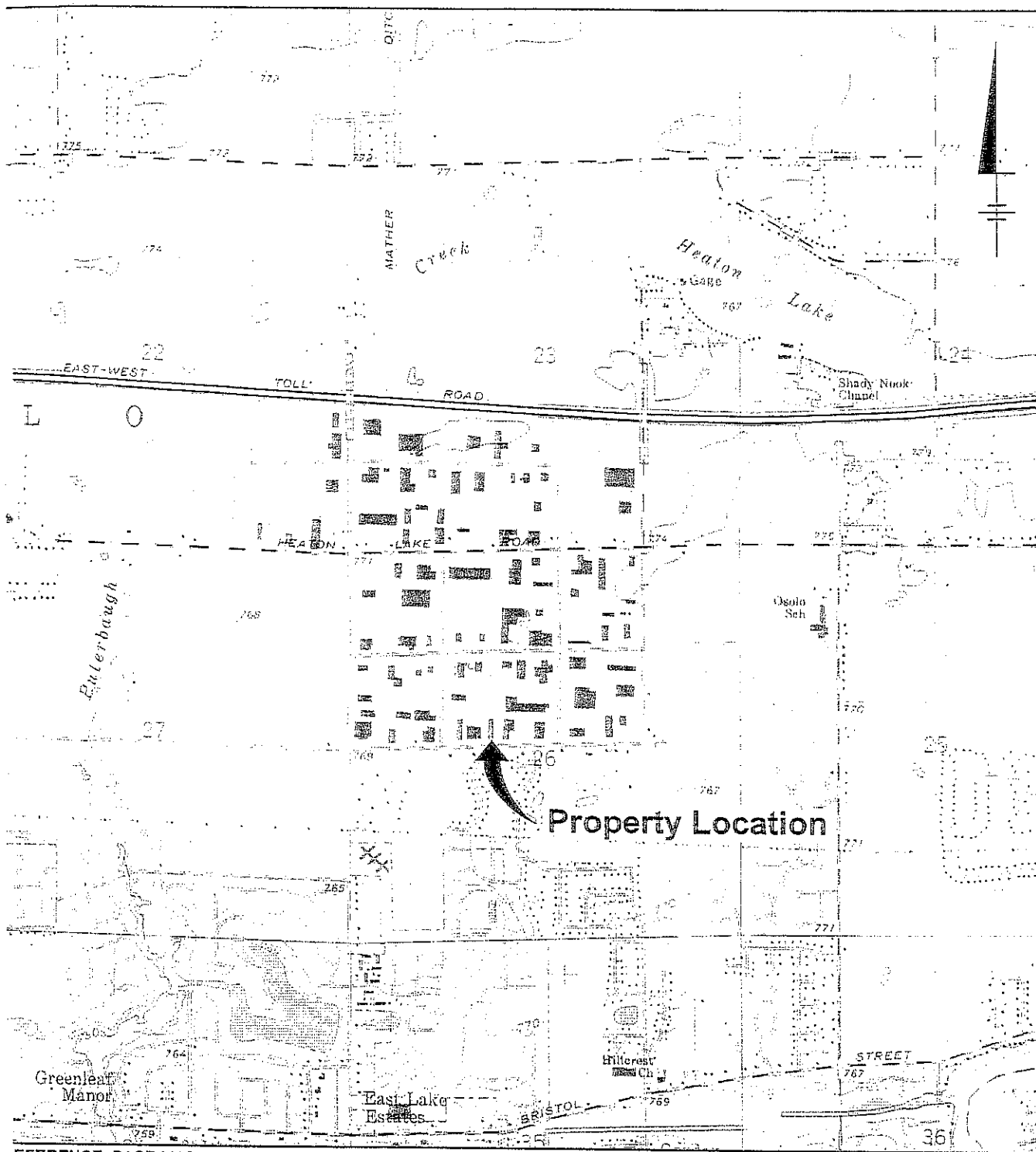
- The contaminant levels are relatively low, even near the assumed source(s); and
- The properties are industrial in nature.

7. References

- Blasland, Bouck & Lee, Inc. (BBL), 1999a. Letter from BBL to Mr. James Ditzkoff (Danaher Corporation) regarding Scope of Work for Phase II Environmental Site Assessment, April 26, 1999a.
- BBL, 1999b. *Phase I Environmental Site Assessment*, July 1999b.
- Environmental Test Systems, Inc. (ETS), 1999. Personal communication with and documents provided by ETS to William P. Havener, BBL, April 1999.
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- IDNR, 1987. *Bedrock Geologic Map of Indiana*, 1987.
- IDNR, 1989. *Quaternary Geologic Map of Indiana*, 1989.
- Soil Conservation Service (SCS), 1974. *Soil Survey of Elkhart County, Indiana*, April 1974.
- United States Environmental Protection Agency (USEPA), 1996. *Drinking Water Regulations and Health Advisories*, EPA 822-B-96-002, October 1996.
- United States Geological Survey, (USGS); 1961. *Topographic Map for Elkhart, Indiana*, 1961 (revised 1994).
- USGS, 1984. *Elemental Concentrations in Soils and Other Surficial Materials of the Conterminous United States*, USGS Professional Paper 1270, 1984.

Figures

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REFERENCE: BASE MAP SOURCE: USGS 7.5 MINUTE QUAD. SERIES ELKHART, INDIANA, 1961.

0 1000' 0 2000'

Approximate Scale: 1" = 2000'



AREA LOCATION

DANAHER CORPORATION
ETS FACILITY - ELKHART, INDIANA

PHASE II ENVIRONMENTAL SITE ASSESSMENT

PROPERTY LOCATION MAP

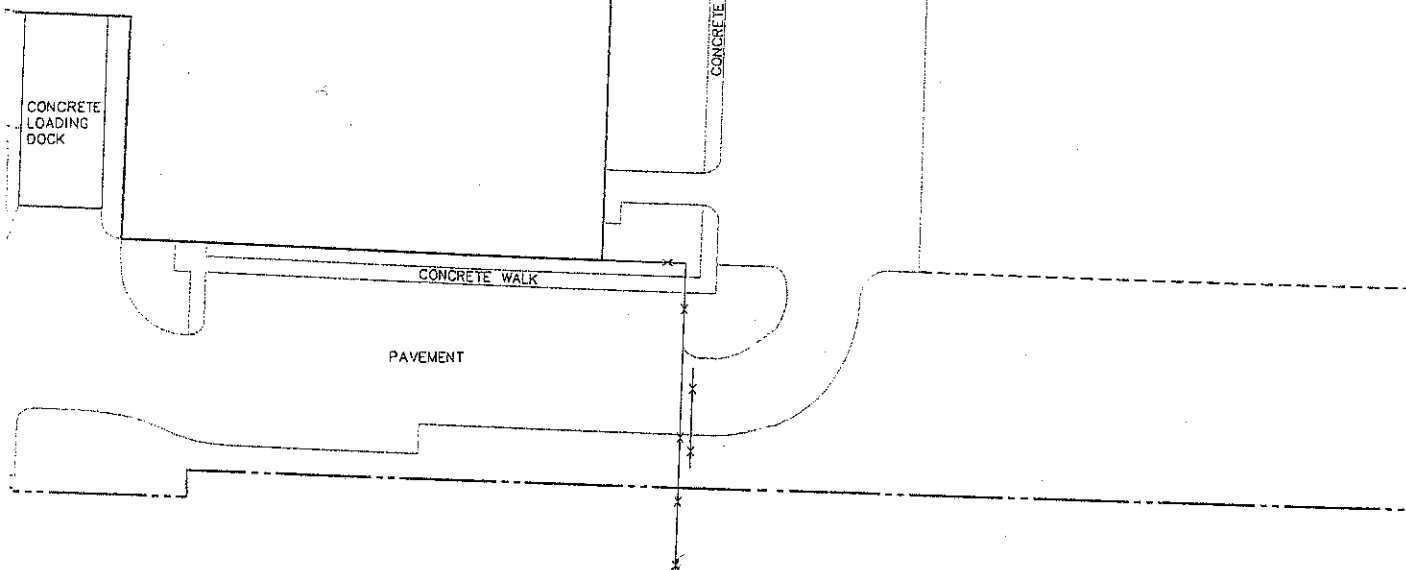
BBL

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FIGURE

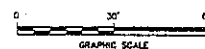
1

IS, INC.



NOTES:

1. ALL SITE FEATURES ARE APPROXIMATE
2. BASE MAP SITE FEATURES LOCATED USING DISTANCES SHOWN ON A MAP PROVIDED BY ETS, INC. CORPORATION ENTITLED LAY-OUT STACK LOCATIONS, DATED 9/19/97.
3. SEPTIC SYSTEMS ADDED BY SCALING FROM A MAP ENTITLED: ADDITION TO ENVIRONMENTAL TEST SYSTEMS INC., DATED 6/13/88, (JOB: 88-215).
4. PROPERTY LINES AND EASEMENT LINES ADDED FROM A MAP PROVIDED BY ETS, INC., (NO TITLE OR DATE); THEY SHOULD NOT BE CONSIDERED ACCURATE.
5. LOCATION OF SEPTIC FIELD EAST OF THE FACILITY WAS ADJUSTED FROM THE PROPOSED ADDITION MAP (6/13/88) BASED ON DISCUSSIONS WITH THE ETS PLANT ENGINEER ON 4/28/99.
6. SAMPLE LOCATIONS ARE APPROXIMATE.



**DANAHER CORPORATION
ETS FACILITY - ELKHART, INDIANA
PHASE II ENVIRONMENTAL SITE ASSESSMENT**

SAMPLING LOCATIONS

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FIGURE

2

Tables

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TABLE 1
DETECTED CONSTITUENTS IN SOIL
DANAHER CORPORATION
PHASE II ENVIRONMENTAL SITE ASSESSMENT
ELKHART, INDIANA

Constituent	Reported Range for Eastern U.S. ¹	Estimated Range/Concentration for Northern Indiana ²	Indiana Tier 1 Soil Closure Subsurface ¹	TW-01 (5.5-7.5) 4/27/1999	TW-02 (4.0-6.0) 4/27/1999	TW-03 (4.0-6.0) 4/27/1999	TW-04 (4.0-6.0) 4/28/1999	TW-05 (4.0-6.0) 4/28/1999	TW-06 DUPLICATE 4/28/1999	TW-06 (2.0-4.0) 4/28/1999
VOCs (ug/kg)										
Acetone	NA	NA	3,090	6.0 JB	12 B	14 B	16 B	17 B	11 JB	22 B
2-Butanone (MEK)	NA	NA	NA	NA	NA	ND	ND	ND	ND	ND
Toluene	NA	NA	11,800	5.0 J	6.0	7.0	9.0	9.0	ND	9.0
SVOCs (ug/kg)										
Diethylphthalate	NA	NA	453,000	8.0 JB	6.0 JB	11 JB	6.0 JB	12 JB	6.0 JB	4.0 JB
Di-n-butylphthalate	NA	NA	NA	33 JB	29 JB	31 JB	27 JB	36 JB	23 JB	32 JB
Bis(2-Ethylhexyl)phthalate	NA	NA	1,000,000	24 JB	17 JB	19 JB	16 JB	47 JB	15 JB	13 JB
Di-n-octylphthalate	NA	NA	1,000,000	20 JB	42 JB	52 JB	41 JB	76 JB	140 JB	83 JB
Inorganics (mg/kg)										
Aluminum	7,000 - >100,000	700 - 20,000	NA	3010	3080	2250	3230	1920	2080	7470
Arsenic	<0.1 - 73	4.1	29,200	1.4	2.0	ND	2.6	ND	ND	3.0
Barium	10 - 1,500	300	1,000,000	ND	ND	ND	ND	ND	ND	45.7
Calcium	100 - 280,000	3,500 - 5,200	NA	ND	ND	ND	ND	ND	ND	ND
Chromium	1 - 1,000	1 - 20	38,400(TOTAL)	5.1	5.8	4.2	5.4	4.0	4.2	8.8
Copper	<1 - 700	15	582,000	4.0	ND	ND	ND	ND	ND	ND
Iron	100 - >100,000	15,000	NA	5080	4820	3800	5050	2530	3720	8050
Lead	<10 - 300	<10	81,000	2.9	2.6	3.0	3.4	2.0	2.1	5.2
Magnesium	50 - 50,000	50 - 1,500	NA	784	ND	ND	ND	ND	ND	1120
Manganese	<2 - 7,000	700	NA	81	51.8	25.7	129	31.4	48.8	240
Nickel	<5 - 700	15	130,000	ND	ND	ND	ND	ND	ND	ND
Selenium	<0.1 - 3.9	<0.1 - 0.1	5,200	ND	ND	ND	1.4	ND	ND	1.2
Vanadium	<7 - 300	<7 - 20	ND	6.7	ND	ND	ND	ND	ND	13.8
Zinc	<5 - 2,900	28	1,000,000	21.8	15.7	20.9	16.8	8.4	11.7	25.2

NOTES:

Concentrations for organic compounds in micrograms per kilogram (ug/kg), equivalent to parts per billion (ppb).

Concentrations for inorganic constituents in milligrams per kilogram (mg/kg), equivalent to parts per million (ppm).

B = Indicates that the compound was also detected in an associated blank.

J = Indicates that the concentration is estimated.

ND = Not detected.

Inorganics = Target Analyte List (TAL) inorganic constituents (including cyanide), analyzed by USEPA Methods 6000/7000 series for metals and cyanide by 9010.

SVOCs = Target Compound List (TCL) semi-volatile organic compounds, analyzed by USEPA Method 8270.

VOCs = TCL volatile organic compounds, analyzed by USEPA Method 8260.

Table presents constituents that were detected in at least one sample.

Samples collected by BBL and analyzed by Severn Trent Laboratories, Monroe, Connecticut.

Shading indicates inorganic concentrations above Northern Indiana background concentrations.

Criteria Qualifiers:

NA - Not available.

Criteria Reference:

¹ - United States Geological Survey (USGS), Element Concentrations in Soils and Other Surficial Materials of the Conterminous United States, 1984.
Concentration in parts per million.

² - Indiana Department of Environmental Management (IDEM), Draft Technical Resource Guidance Document, February 18, 1999.

TABLE 2
FIELD MEASUREMENTS FOR TEMPORARY WELL SAMPLING

DANAHER CORPORATION
PHASE II ENVIRONMENTAL SITE ASSESSMENT
ELKHART, INDIANA

Parameter	TW-01	TW-02	TW-03	TW-04	TW-05	TW-06
	4/27/1999	4/28/1999	4/28/1999	4/28/1999	4/28/1999	4/28/1999
Temperature (Degrees Centigrade)	14.9	9.0	9.0	12.3	13.1	11.3
Salinity (Percent)	0.02	0.01	0.01	0.02	0.01	0.01
pH (Standard units)	6.84	8.15	8.32	7.58	6.80	6.31
Specific Conductivity (Milliseimens per centimeter)	624	446	454	492	449	426
Turbidity (Nephelometric turbidity units [NTUs])	4	135	>999	86	213	55
Dissolved Oxygen (Milligrams per liter; mg/L) ¹	11.46	11.28	11.37	12.91	13.05	13.17

Notes:

All of the measurements summarized above were taken in the field with a Horiba Instruments Model U-10 meter.

¹ Dissolved oxygen saturation for groundwater ranges from approximately 11 mg/L for a water temperature of 9°C to approximately 9.5 mg/L for a water temperature of 15°C, therefore these readings appear to be high.

TABLE 3

DETECTED CONSTITUENTS IN GROUNDWATER

DANAHER CORPORATION
PHASE II ENVIRONMENTAL SITE ASSESSMENT
ELKHART, INDIANA

Constituent	USEPA MCL/MCLG	Indiana Disc 1 Ground- Water Closure	TW-01 4/27/1999	TW-02 4/28/1999	TW-02 DUPLICATE 4/28/1999	TW-03 4/28/1999	TW-04 4/28/1999	TW-05 4/28/1999	TW-06 4/28/1999
VOCs (ug/L)									
Acetone	NA	788	5.0 JB	ND	ND	14	ND	3.0 JB	ND
Methylene Chloride	5 / 0	NA	2.0 JB	ND	ND	ND	ND	ND	ND
Toluene	1,000	1,000	0.3 J	0.4 J	ND	ND	ND	ND	ND
SVOCs (ug/L)									
2-Methylnaphthalene	NL	NA	0.2 J	ND	ND	ND	ND	ND	ND
Benzoic Acid	NL	146,000	0.3 J	ND	2.0 J	0.2 J	ND	0.2 J	0.3 J
Bis(2-Ethylhexyl)phthalate	6	6	0.1 JB	0.3 JB	0.5 JB	2.0 JB	0.1 JB	0.1 JB	0.3 JB
Butylbenzylphthalate	NA	2,890	ND	ND	0.2 JB	ND	ND	ND	ND
Diethylphthalate	NA	29,200	0.2 JB	0.3 JB	0.4 JB	0.4 JB	0.1 JB	0.2 JB	0.2 JB
Di-n-butylphthalate	NL	3,650	0.0 JB	0.3 JB	3.0 JB	0.9 JB	0.5 JB	0.5 JB	0.7 JB
Di-n-octylphthalate	NL	20	0.1 JB	0.2 JB	0.6 JB	3.0 JB	0.4 JB	0.5 JB	0.7 JB
Isophorone	NA	896	ND	0.1 J	ND	0.6 J	0.2 J	0.1 J	0.1 J
Naphthalene	NA	307	0.1 J	ND	ND	0.04 J	ND	ND	ND
Phenanthrene	NA	ND	0.09 J	ND	ND	ND	ND	ND	ND
Phenol	NA	21,900	0.1 J	ND	ND	ND	ND	ND	ND
Inorganics (mg/L)									
Aluminum	0.05 S	NA	1.06	3.46	2.78	93.8	3.73	7.42	2.69
Arsenic	0.05	0.05	ND	ND	ND	0.108	ND	ND	ND
Barium	2	2	ND	ND	ND	0.532	ND	ND	ND
Cadmium	0.005	0.005	ND	ND	ND	0.0122	ND	ND	ND
Calcium	NL	NA	92.7	95.7	62.8	803	90.9	52.2	43.6
Chromium	0.1	0.1	0.0238	ND	ND	0.017	ND	0.0115	ND
Cobalt	NL	NA	ND	ND	ND	0.113	ND	ND	ND
Copper	1.3, AL, tap	1.3	ND	ND	ND	0.322	ND	ND	ND
Iron	0.3 S	NA	6.82	6.86	5.93	180	0.89	6.38	3.89
Lead	0.015, AL, tap	0.015	0.0082	0.0078	0.0062	0.202	0.0082	0.0098	0.0053
Magnesium	NL	NA	26.2	32.8	28.2	406	27	13.4	16.2
Manganese	0.05 S	NA	0.222	0.229	0.173	7.8	0.513	0.542	0.55
Mercury	0.002	0.002	ND	ND	ND	0.00058	ND	ND	ND
Nickel	0.1	0.1	ND	ND	ND	0.235	ND	ND	ND
Potassium	NL	NA	ND	ND	ND	19.8	ND	6.87	ND
Sodium	NA	NA	33.2	19.6	19.2	28.1	23.4	38.5	20.3
Vanadium	NA	NA	ND	ND	ND	0.184	ND	ND	ND
Zinc	5 S	11	0.0505	0.0262	ND	0.653	0.0273	0.0342	0.0248

NOTES:

Concentrations for organic compounds in micrograms per liter (ug/L), equivalent to parts per billion (ppb).

Concentrations for inorganic constituents in milligrams per liter (mg/L), equivalent to parts per million (ppm).

B = Indicates that the compound was also detected in an associated blank.

J = Indicates that the concentration is estimated.

ND = Not detected.

Inorganics = Target Analyte List (TAL) inorganic constituents (including cyanide), analyzed by USEPA Methods 6000/7000 series for metals and cyanide by 9010.

SVOCs = Target Compound List (TCL) semi-volatile organic compounds, analyzed by USEPA Method 8270.

VOCs = TCL volatile organic compounds, analyzed by USEPA Method 8260.

Table presents constituents that were detected in at least one sample.

Samples collected by BBL and analyzed by Savem Trent Laboratories, Monroe, Connecticut.

Shading indicates concentration at or above the USEPA criteria.

Bold indicates concentration at or above IDEM criteria.

Criteria Qualifiers:

NA - Not available.

NL - Not listed.

AL - Action level

MCL/MCLG - Maximum Contaminant Level/ Maximum Contaminant Level Goal

S - Secondary Drinking Water Standards

Criteria Reference:

1 - United States Environmental Protection Agency (USEPA), Drinking Water Regulations and Health Advisories, EPA 822-B-96-002, October 1996.

2 - Indiana Department of Environmental Management (IDEM), Draft Technical Resource Guidance Document, February 18, 1999.

Appendix A

Soil Boring Logs

BLASLAND, BOUCK & LEE, INC.
engineers & scientists

Date Start/Finish: 4/27/99 / 4/27/99
 Drilling Company: Mateco Drilling Co.
 Driller's Name: Jim Priest
 Drilling Method: Direct-Push

Rig Type: CME-45 Trailer Mount

Borehole Depth: 10 feet

Geologist: David Lay

Well No: TW-1

Client:
 Danaher Corporation

Location:
 Environmental Testing Systems, Inc.
 Elkhart, Indiana

DEPTH	ELEVATION	Sample Number	Sample Int./Type	Blows/6 In.	N	Recovery (ft.)	PID	Headspace	Geotechnical Test	Geologic Column	Stratigraphic Description	Well Construction
											GROUND SURFACE	
		(0-2')		NA	NA	1.8	0.0/0.0				TOPSOIL with grass, rootlets (Top 2"). Brown fine to medium SAND, trace Silt, coarse Sand and Gravel, loose, moist.	
		(2-4')		NA	NA	0	NA				No recovery (2-4' bgs).	Driven point casing.
5												
		(5.5-7.5)*		NA	NA	2.0	0.0/0.0				Same as above.	
											Wet at 7.2' bgs.	
		(7.5-9.5')		NA	NA	1.3	0.0/0.0				Brown medium SAND, trace coarse Sand, loose, wet.	
10											End of sampling at 9.5' bgs. Screen driven to 10' bgs.	Driven point screen (9.5-10' bgs).
5											Installed as a temporary well. Abandoned after sampling. 4/27/99. Borehole backfilled with bentonite pellets.	

BBL
 BLASLAND, BOUCK & LEE, INC.
 engineers & scientists

Remarks:

* Soil sample collected from 5.5-7.5' interval for laboratory analysis. ags/bgs - above/below ground surface. NA - Not available.

Saturated Zones

Date / Time	Elevation	Depth
4/27/99		5.5

Date Start/Finish: 4/27/99 / 4/27/99
 Drilling Company: Mateco Drilling Co.
 Driller's Name: Jim Priest
 Drilling Method: Direct-Push

Borehole Depth: 10 feet

Well No: TW-2

Client:
 Danaher Corporation

Rig Type: CME-45 Trailer Mount

Geologist: David Lay

Location:
 Environmental Testing Systems, Inc.
 Elkhart, Indiana

DEPTH	ELEVATION	Sample Number	Sample/Int/Type	Blows/6 In.	N	Recovery (ft.)	PID	Headspace	Geotechnical Test	Geologic Column	Stratigraphic Description	Well Construction
											GROUND SURFACE	
		(0-2')		NA	NA	1.4	0.0/0.0				TOPSOIL with grass, rootlets (Top 2"). Brown fine to medium SAND, trace Silt, coarse Sand and Gravel, loose, moist.	
		(2-4')		NA	NA	1.0	0.0/0.0				Grades to trace coarse Sand.	1.5" diameter PVC casing (0-4.5' bgs).
5		(4-6')*		NA	NA	1.4	0.0/0.0				Wet at 6' bgs.	
		(6-8')		NA	NA	0.9	0.0					
		(8-10')		NA	NA	1.4	0.0				Brown coarse SAND and fine GRAVEL, little Silt and fine to medium Sand, loose, wet, slight septic odor.	1.5" diameter hand-cut PVC screen (3.3-8.3').
10											Brown medium SAND, little coarse Sand, trace Gravel, loose, wet.	
											End of sampling at 10' bgs.	
5											Installed as a temporary well. Abandoned after sampling, 4/28/99. Borehole backfilled with bentonite pellets.	

BBL
 BLASLAND, BOUCK & LEE, INC.
 engineers & scientists

Remarks:

* Soil sample collected from 4-6' interval for laboratory analysis. ags/bgs - above/below ground surface. NA - Not available.

Saturated Zones

Date / Time	Elevation	Depth
4/28/99		5.88

Date Start/Finish: 4/27/99 / 4/27/99
 Drilling Company: Mateco Drilling Co.
 Driller's Name: Jim Priest
 Drilling Method: Direct-Push

Rig Type: CME-45 Trailer Mount

Borehole Depth: 10 feet

Geologist: David Lay

Well No: TW-3

Client:
 Danaher Corporation

Location:
 Environmental Testing Systems, Inc.
 Elkhart, Indiana

DEPTH	ELEVATION	Sample Number	Sample/Int/Type	Blows/6 In.	N	Recovery (ft.)	PID	Headspace	Geotechnical Test	Geologic Column	Stratigraphic Description	Well Construction
											GROUND SURFACE	
		(0-2')		NA	NA	1.5	0.0/0.0				TOPSOIL with grass, rootlets (Top 2"). Brown fine to medium SAND, little Silt, trace coarse Sand, loose, moist.	
		(2-4')		NA	NA	0.9	0.0/0.0					1.5' diameter PVC casing (0-4.2' bgs).
5		(4-6')*		NA	NA	1.8	0.0/0.0					
		(6-8')		NA	NA	0.8	0.0/0.0				Wet at 5.8' bgs, iron oxide staining just above water table.	
		(8-10')		NA	NA	2.0	0.0/0.0				Brown medium SAND, little coarse Sand and Gravel, loose, wet.	1.5' diameter hand-cut PVC screen (4.2-9.2').
10											End of sampling at 10' bgs.	
15											Installed as a temporary well. Abandoned after sampling, 4/28/99. Borehole backfilled with bentonite pellets.	

BBL
 BLASLAND, BOUCK & LEE, INC.
 engineers & scientists

Remarks:

* Soil sample collected from 4-6' interval for laboratory analysis. ags/bgs - above/below ground surface. NA - Not available.

Saturated Zones

Date / Time	Elevation	Depth
4/28/99		5.31

Date Start/Finish: 4/28/99 / 4/28/99
 Drilling Company: Mateco Drilling Co.
 Driller's Name: Jim Priest
 Drilling Method: Direct-Push

Rig Type: CME-45 Trailer Mount

Borehole Depth: 10 feet

Geologist: David Lay

Well No: TW-4

Client:
 Danaher Corporation

Location:
 Environmental Testing Systems, Inc.
 Elkhart, Indiana

DEPTH	ELEVATION	Sample Number	Sample/Int/Type	Blows/6 In.	N	Recovery (ft.)	PID	Headspace	Geotechnical Test	Geologic Column	Stratigraphic Description	Well Construction
											GROUND SURFACE	
		(0-2')		NA	NA	2.0	0.0/0.0				TOPSOIL with grass, rootlets (Top 2"). Brown fine to medium SAND, little Silt, trace coarse Sand and Gravel loose, moist.	
		(2-4')		NA	NA	1.3	0.0/0.0					15" diameter PVC casing (0-4.1' bgs.)
5		(4-6')*		NA	NA	2.0	0.0/0.0				Grades between wet at 5.5-6.0' bgs.	
		(6-8')		NA	NA	1.3	0.0/0.0				Brown coarse SAND and fine GRAVEL, little fine to medium Sand, loose, wet.	
		(8-10')		NA	NA	1.4	0.0/0.0				Brown medium SAND, little coarse Sand and Gravel, loose, wet.	15" diameter hand-cut PVC screen (4.1-9.1')
10											End of sampling at 10' bgs.	
											Installed as a temporary well. Abandoned after sampling, 4/28/99. Borehole backfilled with bentonite pellets.	
5												

BBL
 BLASLAND, BOUCK & LEE, INC.
 engineers & scientists

Remarks:

* Soil sample collected from 4-6' interval for laboratory analysis. ags/bgs - above/below ground surface. NA - Not available.

Saturated Zones

Date / Time	Elevation	Depth
4/28/99		5.00

Date Start/Finish: 4/28/99 / 4/28/99
 Drilling Company: Mateco Drilling Co.
 Driller's Name: Jim Priest
 Drilling Method: Direct-Push

Borehole Depth: 10 feet

Well No: TW-5

Client:
 Danaher Corporation

Rig Type: CME-45 Trailer Mount

Geologist: David Lay

Location:
 Environmental Testing Systems, Inc.
 Elkhart, Indiana

DEPTH	ELEVATION	Sample Number	Sample/Int/Type	Blows/6 In.	N	Recovery (ft.)	PID	Headspace	Geotechnical Test	Geologic Column	Stratigraphic Description	Well Construction
											GROUND SURFACE	
		(0-2')		NA	NA	1.6	0.0/0.0				Dark brown TOPSOIL with grass, rootlets (Top 2"). Brown fine to medium SAND, little Silt, and Gravel loose, moist.	
		(2-4')		NA	NA	0.8	0.0/0.0					15" diameter PVC casing (0-4.6' bgs.)
5		(4-6')*		NA	NA	1.5	0.0/0.0				Grades between wet at 5.5-6.0' bgs.	
		(6-8')		NA	NA	0.9	0.0/0.0					15" diameter hand-cut PVC screen (4.6-9.6')
		(8-10')		NA	NA	1.3	0.0/0.0					
											End of sampling at 10' bgs.	
6											Installed as a temporary well. Abandoned after sampling, 4/28/99. Borehole backfilled with bentonite pellets.	

BBL
 BLASLAND, BOUCK & LEE, INC.
 engineers & scientists

Remarks:

* Soil sample collected from 4-6' interval for laboratory analysis. ags/bgs - above/below ground surface. NA - Not available.

Saturated Zones

Date / Time	Elevation	Depth
4/28/99		5.10 ▼

Date Start/Finish: 4/28/99 / 4/28/99
 Drilling Company: Mateco Drilling Co.
 Driller's Name: Jim Priest
 Drilling Method: Direct-Push

Rig Type: CME-45 Trailer Mount

Borehole Depth: 10 feet

Geologist: David Lay

Well No: TW-6

Client:
 Danaher Corporation

Location:
 Environmental Testing Systems, Inc.
 Elkhart, Indiana

DEPTH	ELEVATION	Sample Number	Sample/Int/Type	Blows/6 In.	N	Recovery (ft.)	PID	Headspace	Geotechnical Test	Geologic Column	Stratigraphic Description	Well Construction
											GROUND SURFACE	
		(0-2')		NA	NA	1.6	0.0/0.0				Dark brown TOPSOIL (top 1"). Brown fine SAND and SILT, little medium Sand, wood particles, loose, moist.	
		(2-4)*		NA	NA	0.9	0.0/0.0				Brown fine to medium SAND, little Silt, loose, moist.	
5		(4-6')		NA	NA	1.4	0.0/0.0				Wet at 6.0' bgs.	
		(6-8')		NA	NA	1.0	0.0/0.0					
		(8-10')		NA	NA	2.0	0.0/0.0				Brown medium SAND, trace Silt, loose, wet.	
10											End of sampling at 10' bgs.	
15											Installed as a temporary well. Abandoned after sampling, 4/28/99. Borehole backfilled with bentonite pellets.	

15' diameter PVC casing
 (0-3.4' bgs).

15' diameter hand-cut
 PVC screen (3.4-8.4').

BBL
 BEASLAND, BOUCK & LEE, INC.
 engineers & scientists

Remarks:

* Soil sample collected from 2-4' interval for
 laboratory analysis. ags/bgs - above/below
 ground surface. NA - Not available.

Saturated Zones

Date / Time	Elevation	Depth
4/28/99		5.55

APPENDIX F
MANIFESTS FOR HAZARDOUS WASTES



5-082-01

P.O. BOX 19276

SPRINGFIELD, ILLINOIS 62704-9276 (217) 782-6761

FOR SHIPMENT OF HAZARDOUS
AND SPECIAL WASTE

State Form LPC 82 B/81

IL632-0810

PLEASE TYPE

(Form designed for use on elite (12-pitch) typewriter.)

EPA Form 8700-22 (Rev. 6-89)

Form Approved, OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. IND152094785		Manifest Document No. 30893	2. Page 1 of 1	Information in the shaded areas is not required by Federal law, but is required by Illinois law.			
3. Generator's Name and Mailing Address ENVIRONMENTAL TEST SYSTEMS 23575 CO RD 106 ELKHART IN 46514					A. Illinois Manifest Document Number IL10596873 FEE PAID IF APPLICABLE				
4. "24 HOUR EMERGENCY AND SPILL ASSISTANCE NUMBERS"					B. Generator's IL ID Number 9100019999				
5. Transporter 1 Company Name SAFETY-KLEEN SYSTEMS, INC					C. Transporter's ID Number UP01512881L				
6. US EPA ID Number TXR000050930					D. Transporter's Phone (574) 289-4510				
7. Transporter 2 Company Name					E. Transporter's ID Number				
8. US EPA ID Number					F. Transporter's Phone				
9. Designated Facility Name and Site Address SAFETY-KLEEN SYSTEMS, INC 633 E 138TH ST DOLTON, IL 60419					G. Facility's IL ID Number 0310690006				
10. US EPA ID Number ILD980613913					H. Facility's Phone (708) 225-8100				
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)						12. Containers	13. Total Quantity	14. Unit Wt/Vol	Waste No.
a. WASTE COMBUSTIBLE LIQUID, N.O.S. (PETROLEUM NAPHTHA) NA1993 PGIII (ERG128) 6.7LBS/GAL (D039)						No. 001	Type DF	5	EPA HW Number D039
b.									EPA HW Number
c.									EPA HW Number
d.									EPA HW Number
J. Additional Description for Materials Listed Above						K. Handling Codes for Wastes Listed Above In Item #14 (A) T54			
15. Special Handling Instructions and Additional Information 0304 102997085 0022630853 0000233214 14 SK AUTHORIZED TO RETAIN LICENSED SUBSEQUENT CARRIER, AS NECESSARY. *EMERGENCY RESP#800-468-1760 24HR									
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.									
Printed/Typed Name John B. Crew					Signature <i>[Signature]</i>		Date 01/22/03		
17. Transporter 1 Acknowledgement of Receipt of Materials					Signature <i>[Signature]</i>		Date 01/22/03		
18. Transporter 2 Acknowledgement of Receipt of Materials					Signature		Date		
19. Discrepancy Indication Space									
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.					Signature <i>[Signature]</i>		Date 01/22/03		

This Agency is authorized to require, pursuant to Illinois Revised Statute, 1980, Chapter 117, 1/2, Section 1004 and 1981, that this information be submitted to the Agency. Failure to provide this information may result in a civil penalty against the owner or operator not to exceed \$25,000 per day of violation. Failure to provide this information may result in a fine up to \$50,000 per day of violation and imprisonment up to 6 years. This form has been approved by the Forms Management Center.

COPY 1. TSD MAIL TO GENERATOR

FEB 11 2003

HER 083684

PLEASE PRINT OR TYPE

(Form designed for use on elite (12-pitch) typewriter.)

Form Approved: OMB No. 2050-0039. Expires 6-30-99

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's U.S. EPA ID Number N D 1 5 2 0 9 4 7 8 5	Manifest Document No. 8-56-84	2. Page 1 of 2	Information in the shaded areas is not required by Federal Law.
3. Generator's Name and Mailing Address ENVIRONMENTAL TEST SYSTEMS 28575 CR 106, ELKHART, IN 46514			A. State Manifest Document Number		
4. Generator's Phone (574) 262-2060			B. State Generator's ID		
5. Transporter 1 Company Name HERITAGE TRANSPORT, LLC/TECH SERVICE			6. U.S. EPA ID Number N D 0 5 8 4 8 4 1 1 4	C. State Transporter's ID (27) 24-6849	
7. Transporter 2 Company Name			8. U.S. EPA ID Number	D. State Transporter's ID	
9. Designated Facility Name and Site Address VON ROLL AMERICA, INC. 1250 SAINT GEORGE STREET EAST LIVERPOOL, OH 43920			10. U.S. EPA ID Number O H D 9 8 0 6 1 3 5 4 1	E. State Facility's ID 1820-585-7235	
11. U.S. DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers No. Type	13. Total Quantity	14. Unit Wt/Vol	15. Waste No.
Waste Corrosive Liquids, Flammable, Organic, n.o.s., 8, UN 2920, PGI (Acetic Anhydride Acid) Hydrochloric		ERG# 132	00.1	D.F. 00.00.00	P D002
Waste Corrosive Liquids, Flammable, n.o.s., 8, UN 2920, PGI (H4 Diimino Butane, Sodium Hydroxide)		ERG# 132	00.1	D.F. 00.00.00	P D002
Waste Flammable Liquids, Corrosive, n.o.s., 3, UN 2924 PGI (G-Butyl Acetone, Acetonitrile)		ERG# 132	00.1	D.F. 00.00.00	P D003
Waste Oxidizing Liquid, Corrosive, n.o.s., 5, UN 3099, PGI (Potassium Permanganate, Hydrogen Peroxide)		ERG# 140	0.0.1	D.F. 00.00.00	P D001
Special Handling Instructions for Materials Listed Above ADETS - 1, 2, 3, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 97, 98, 99, 100 ADETS - 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 97, 98, 99, 100 ADETS - 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 97, 98, 99, 100					
15. Special Handling Instructions and Additional Information 24 HOUR EMERGENCY PHONE #: 303-623-5716 WS# ETGT 600 H8C30903203 PO# 88135					
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.					
Printed/Typed Name John Dethen		Signature 		Date Month 08 Day 20 Year 03	
17. Transporter 1 - Acknowledgement of Receipt of Materials Printed/Typed Name Steve Gellard		Signature 		Date Month 08 Day 20 Year 03	
18. Transporter 2 - Acknowledgement of Receipt of Materials Printed/Typed Name		Signature		Date Month Day Year	
19. Discrepancy Indication Space					
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest (except as noted in item 19). Printed/Typed Name Steve E. Billiter					
Signature 		Signature 		Date Month 08 Day 20 Year 03	

EPA Form 8700-22 (Rev. 10-04) Previous editions are obsolete.

COPY 2 - RETURN TO GENERATOR

SEP 09 2003

SEP-8-2004 WED 11:48AM ID:

PAGE: 3

In case of a spill, call the National Response center at 800 / 424-8802 or 202 / 426-2675

SIGNATURE AND INFORMATION MUST BE LEGIBLE ON ALL COPIES

PLEASE PRINT OR TYPE

(Form designed for use on ellipse (12-pitch typewriter))

Form approved, OMB No. 2050-0099, Expires 9-30-99

UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)		21. Generator's U.S. EPA ID Number	Manifest Document No.	22. Page	Information in the shaded areas is not required by Federal Law.	
23. Generator's Name Environmental Test Systems		21. Generator's U.S. EPA ID Number FND 152094785		22. Page 2 of 2	L. State Manifest Document Number HER083684	
24. Transporter Company Name		25. U.S. EPA ID Number		M. State Transporter ID		
26. Transporter Company Name		26. U.S. EPA ID Number		N. State Transporter ID		
29. U.S. DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		29. Containers No.	Type	30. Total Quantity	31. Unit: Wt/Vol	32. Waste No.
a. Waste Oxidizing Liquid, Corrosive, Acids, 5.1, UN 3044, PG II (Hydrogen Peroxide, Potassium Permanganate) ERG 137		WS	DOT	8-20-03		
b. Waste Zinc Dust, 4.3, UN 1436, PG II ERG 138		001	DF	000.08	P	0001
c. Waste Organic Peroxide, Type F, Liquid, 5.2, UN 3009, PG II (Cumene Hydroperoxide) ERG 145		001	DF	000.07	P	0096
d. Waste Toxic Liquid, Flammable, Organic, n.o.s., 6.1, UN 2929, PG II (Dichloroethane, 3-Dimethylamino Propanol) ERG 131		001	DF	002.00	P	0158
e. Waste Flammable Liquid, n.o.s., 3, UN 1993, PG II (Ethyl Acetate, Tetrahydrofuran) ERG 128		001	DF	002.00	P	0313
f. Waste Toxic Solids, Inorganic, n.o.s., 6.1, UN 3088, PG II (Sodium Azide, Calcium) ERG 151		001	DF	0.0015	P	0105
g. Waste Aerosol Flammable, n.o.s., 2, UN 1950 (Petroleum Distillates, Isopropyl) ERG 128		001	DF	000.18	P	0001
32. Special Handling Instructions and Additional Information						
33. Transporter Acknowledgement of Receipt of Materials		34. Transporter Acknowledgement of Receipt of Materials		DATE		
Printed / Typed Name		Signature		Month Day Year		
35. Discrepancy Indication Space						

EPA Form 8700-22A (Rev. 10-94) Previous editions are obsolete.

COPY 2 - RETURN TO GENERATOR.

In case of a spill, call the National Response center at 800 / 424-8802 or 202 / 426-2675



HER117515

PLEASE PRINT OR TYPE

(Form designed for use on elite (12-pitch) typewriter.)

Form Approved: OMB No. 2050-0039. Expires 9-30-99

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's U.S. EPA ID Number 1 0 0 1 0 0 0 0 0 0 0 0 0 0 0 0	Manifest Document No. 3 2 2 0 0 0 0 0 0 0 0 0 0 0 0 0	2. Page 1 of 1	Information in the shaded areas is not required by Federal Law.	
3. Generator's Name and Mailing Address ENVIRONMENTAL TEST SYSTEMS 20375 CR 106, ELKHART, IN 46514				A. State Manifest Document Number		
4. Generator's Phone (574) 262-0050				B. State Generator's ID		
5. Transporter 1 Company Name ARMITAGE TRANSPORT, LLC		6. U.S. EPA ID Number 1 0 0 1 0 0 0 0 0 0 0 0 0 0 0 0		C. State Transporter's ID		
7. Transporter 2 Company Name		8. U.S. EPA ID Number		D. Transporter's Phone		
9. Designated Facility Name and Site Address HSPILAGE ENVIRONMENTAL SERVICES LLC 7101 WEST MORRIS STREET INDIANAPOLIS, IN 46231		10. U.S. EPA ID Number 1 0 0 1 0 0 0 0 0 0 0 0 0 0 0 0		E. State Transporter's ID		
				F. Transporter's Phone		
				G. State Facility's ID		
				H. Facility's Phone		
11. U.S. DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers No. Type		13. Total Quantity	14. Unit Wt/Vol	
a. 30. WASTE RESIDUES, 4.0.2, 3, UN1987, PG 711, STRONG, PROPOSED AUTOMOTIVE, 1000, 2000, 3000, 4000, 5000, 6000, 7000, 8000, 9000, 10000, 11000, 12000, 13000, 14000, 15000, 16000, 17000, 18000, 19000, 20000, 21000, 22000, 23000, 24000, 25000, 26000, 27000, 28000, 29000, 30000, 31000, 32000, 33000, 34000, 35000, 36000, 37000, 38000, 39000, 40000, 41000, 42000, 43000, 44000, 45000, 46000, 47000, 48000, 49000, 50000, 51000, 52000, 53000, 54000, 55000, 56000, 57000, 58000, 59000, 60000, 61000, 62000, 63000, 64000, 65000, 66000, 67000, 68000, 69000, 70000, 71000, 72000, 73000, 74000, 75000, 76000, 77000, 78000, 79000, 80000, 81000, 82000, 83000, 84000, 85000, 86000, 87000, 88000, 89000, 90000, 91000, 92000, 93000, 94000, 95000, 96000, 97000, 98000, 99000, 100000		0.0.2 0.0.1		0.0.1/1.0	G	
b.						
c.						
d.						
15. Special Handling Instructions and Additional Information 14 HOUR EMERGENCY PHONE 24/7-800 421 7500						
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.						
Printed/Typed Name David Morris		Signature David Morris		Month Day Year 3 2 2 0 0 0		
17. Transporter 1 - Acknowledgement of Receipt of Materials Printed/Typed Name Jim Hadley		Signature Jim Hadley		Month Day Year 3 2 2 0 0 0		
18. Transporter 2 - Acknowledgement of Receipt of Materials Printed/Typed Name		Signature		Month Day Year		
19. Discrepancy Indication Space						
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest (except as noted in item 19). Printed/Typed Name Rick Van Dine						
		Signature Rick Van Dine		Month Day Year 3 2 2 0 0 0		

EPA Form 8700-22 (Rev. 10-94) Previous editions are obsolete.

COPY 2 - RETURN TO GENERATOR

In case of a spill, call the National Response center at 800 / 424-8802 or 202 / 426-2675

APPENDIX G
PERSONNEL QUALIFICATIONS

CONLEY B. PHIFER

Education:

Purdue University
B.S.-Environmental Health, 1979
University of Pittsburgh
M.S.-Industrial Hygiene, 1985

Professional Affiliations/ Certifications:

Certified Hazardous Materials Manager
Certified Indoor Environmentalist
40-hour HazWoper Training

Experience:

Mr. Phifer has more than 20 years of professional environmental consulting experience. Mr. Phifer's experience includes serving as Department Manager/Senior Project Manager for environmental site assessments for commercial and industrial properties throughout the United States. In this capacity, Mr. Phifer has performed or had direct responsibility for management more than 1000 Phase I/II Environmental site assessments of varying degrees of complexity. Mr. Phifer also served as Environmental Consultant/Project Manager for numerous EPA Region IV Alternative Remedial Contracting Service (ARCS) sites. Specific projects have included performing Remedial Investigation/Feasibility Studies (RI/FS), Remedial Designs (RD) and Remedial Actions (RA) for several EPA "Superfund" sites in the southeastern United States. Mr. Phifer served as Technical Assistance Team (TAT) Leader for a dedicated EPA Region IV contract involved with emergency response and removal activities at sites involving the release or threat of release of hazardous materials. Mr. Phifer has assisted numerous industrial clients in the management of hazardous wastes (assessment, RCRA closure, remediation) and underground storage tank systems (assessment, removal remediation, closure).